

Report on
2020 Universal Service Programs &
Collections Performance

of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies





Universal Service Programs & Collections Performance 2020

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1. Introduction

The Pennsylvania Public Utility Commission's (PUC's) Annual Report on 2020 Universal Service Programs and Collections Performance includes data and performance metrics for the seven major Pennsylvania electric distribution companies (EDCs) and the six major natural gas distribution companies (NGDCs), during the 2020 calendar year.

The Electricity Generation Customer Choice and Competition Act¹ and the Natural Gas Choice and Competition Act² opened the electric generation and natural gas supply markets to competition. In doing so, the General Assembly wanted to ensure that electric and natural gas service remain universally available to all customers in the state. Consequently, both Acts contain provisions relating to universal electric and gas service, and require the Commission to maintain, at a minimum, the protections, policies, and services that assist customers who are low-income to afford electric and gas service.³ The Acts also require the Commission to ensure that universal service and energy conservation policies are appropriately funded and available in each electric and natural gas distribution territory.⁴

To assist in fulfilling its universal service obligations, the Commission established standard reporting requirements for universal service and energy conservation for both the EDCs and the NGDCs. The Universal Service and Energy Conservation Reporting Requirements (USRR) became effective Aug. 8, 1998, for EDCs and Dec. 16, 2000, for NGDCs. This data assists the Commission in monitoring the progress of the EDCs and NGDCs in achieving universal service in their respective service territories. Beginning with 2003 data, FirstEnergy Corp. requested permission to identify and report separately on the four FirstEnergy utilities: Metropolitan Edison (Met-Ed), Pennsylvania Electric (Penelec), Pennsylvania Power (Penn Power) and West Penn Power (West Penn). The other utilities subjected to these reporting requirements are Duquesne Light (Duquesne), PECO-Electric, PPL Electric Utilities (PPL), Columbia Gas of Pennsylvania (Columbia), National Fuel Gas (NFG), PECO-Gas, Peoples Natural Gas (Peoples), Philadelphia Gas Works (PGW), and UGI Utilities - Gas.

Each year, the EDCs and NGDCs report the previous year's data by April 1. The PUC then conducts a data-cleaning and error-checking process, including both written and verbal dialogue between the PUC and the reporting utilities. Uniformity issues are documented in various tables, charts and appendices and also are discussed in more detail in later chapters. The PUC continues to work with the EDCs and NGDCs to obtain uniform data that fully complies with the regulations.

Impact of Utility Mergers on 2020 Collections and Universal Service Data

Due to the Peoples Natural Gas merger, Peoples began reporting combined data as of Jan. 1, 2020; therefore, the 2020 Peoples data includes the rate district formerly served by Peoples-Equitable. Likewise, due to the UGI Gas merger, UGI Utilities - Gas began reporting combined data as of Jan. 1, 2020; therefore, the 2020 UGI Utilities – Gas data includes the rate districts formerly served by UGI South, UGI North, and UGI Central. Prior to 2020, UGI Utilities was not

¹ 66 Pa. C.S. §§ 2801-2812

² 66 Pa. C.S. Chapter 22

³ 66 Pa. C.S. §§ 2203(7), §§ 2802(10)

⁴ 66 Pa. C.S. §§ 2203(8), §§ 2804(9)

⁵ 52 Pa. Code §§ 54.71–54.78, §§ 62.1-62.8

⁶ 52 Pa. Code § 54.75 for EDCs and 52 Pa. Code § 62.5 for NGDCs

⁷ On Oct. 3, 2019, at Docket No. R-2018-3006818, *et al.*, the Commission approved the merger of People Natural Gas' separate Peoples and Equitable rate districts into a single rate district known as Peoples Natural Gas LLC. Although this change took effect when Peoples Natural Gas LLC's amended tariff became effective on Oct. 29, 2019, data reported based on the combined rate districts did not begin until Jan. 1, 2020.

⁸ 66 Pa. C.S. § 1403 includes Philadelphia Gas Works (PGW), a city natural gas distribution operation, within the category of natural gas distribution utilities.

⁹ On Oct. 4, 2019, at Docket No. R-2018-3006814, *et al.*, the Commission approved the merger of of the UGI Utilities, Inc. separate rate districts – UGI South, UGI North, and UGI Central – into one rate district existing as UGI Utilities, Inc. – Gas Division. Although this change took effect when UGI's amended tariff became effective on Oct. 11, 2019, data reported based on the combined rate districts did not begin until Jan. 1, 2020.

required to report collections and universal service data for the rate district formerly served by UGI Central. Therefore, the 2020 data for UGI-Utilities -Gas is not comparable to combined data reported by UGI South and UGI North in 2018 or 2019.

Treatment of Confirmed Low-Income Data Among the Collections Performance Data

A low-income customer is defined as one whose household income is at or below 150% of the federal poverty income guidelines (FPIG).¹⁰ A low-income customer is classified as confirmed low-income after their utility has obtained information that would reasonably place them within this FPIG level. Most confirmed low-income households are verified through the customer's receipt of a Low Income Home Energy Assistance Program¹¹ (LIHEAP) grant, enrollment in a Universal Service program or determined during the course of making a payment arrangement. We have included collection data about confirmed low-income customers for only a select number of collections performance metrics. The confirmed low-income data tables are subsets of the Residential data tables appearing in Chapter 2 and are reported separately in the USRR.

Universal Service Programs

Universal Service is a collective name applied to the policies, protections and services that help low-income customers maintain electric and natural gas service and includes payment assistance programs, termination of service protections, energy reduction programs, and consumer education.¹² The Commission has made the Bureau of Consumer Services (BCS) responsible for monitoring and evaluating utilities' universal service programs. The goal in monitoring these programs is to ensure they increase the effectiveness of EDC and NGDC collections while protecting the public's health and safety. There are four individual universal service programs.

The **Low-Income Usage Reduction Programs (LIURPs)** are energy conservation and education programs. Qualifying households receive an energy audit to assess household condition and energy usage; free installation of energy conservation and energy efficiency measures such as insulation, air sealing, and appliance installation if cost effective; and free education on energy conservation and usage reduction.

Customer Assistance Programs (CAPs) are payment assistance and debt forgiveness programs for low-income households. CAPs are intended to provide more affordable monthly bills based on a set energy burden standard. CAP billing credits may be applied to ongoing usage as long as the household remains current and timely in paying its monthly CAP payments. CAP charges may take the form of a discounted price on actual usage on either all or a portion of the usage, ¹³ a percentage of the monthly bill, ¹⁴ or a monthly amount that is calculated upon a percentage of the household income. ¹⁵ Percentage of income plans are correlated directly to the household's income and the utility's energy burden targets. CAP's debt forgiveness feature freezes a household's unpaid past debt upon entry into the program. As long as the household remains current and timely on their future CAP payments, the past debt is not collected and is forgiven in incremental amounts over time.

Customer Assistance and Referral Evaluation Services (CARES) are social service and referral programs for households encountering some form of extenuating circumstance or emergency that results in the household's inability to pay for public utility service. Qualifying households may receive counseling and/or direct referrals to community resources that can aid in resolving the emergency.

¹⁰ See Appendix 3

¹¹ LIHEAP is a federally funded program administered by the Department of Human Services (DHS) which provides grants to help low-income households meet their home heating needs.

¹² Electricity Generation Customer Choice and Competition Act at 66 Pa.C.S.A. § 2803 and Natural Gas Choice Competition Act at 66 Pa.C.S.A. § 2202.

¹³ Also referred to as a "rate discount bill."

¹⁴ Also referred to as a "percent of bill."

¹⁵ Also referred to as a "percent of income payment" (PIP).

Hardship Funds are programs that make cash grants available to qualifying households to assist in the payment of outstanding debt owed to the public utility. They are paid directly to the utility and generally funded through contributions made by the public that are matched by the utility.

LIURP Regulations Review

On Dec. 16, 2016, the Commission issued a Secretarial Letter entitled Initiative to Review and Revise the Existing Low-Income Usage Reduction Program (LIURP) Regulations at 52 Pa. Code §§ 58.1 – 58.18, under Docket No. L-2016-2557886. The proceeding is still ongoing at the time of this publication.

CAP Policy Statement

The Commission's CAP Policy Statement was amended effective Mar. 21, 2020, pursuant to an order and annex entered on Nov. 5, 2019, and published in the *Pennsylvania Bulletin*, at 50 Pa.B 1652, on Mar. 21, 2020 (November 2019 Order and November 2019 Annex). The promulgation of the CAP Policy Statement (2020) culminated from two proceedings begun in 2017 – *Energy Affordability for Low-Income Customers* at Docket No. M-2017-2587711 and *Review of Universal Service and Energy Conservation Programs* at Docket No. M 2017 2596907 – that comprehensively reviewed the policies, practices, procedures, and impacts of universal service programs on low-income customers and other ratepayers. Based on utility data, projections, and stakeholder comments in these two proceedings and in other dockets, the Commission approved amendments to the CAP Policy Statement by the November 2019 Order and November 2019 Annex. The amendments include lower recommended maximum energy burden targets for electric and natural gas CAP bills.

Treatment of PECO Data

PECO serves three types of customers: those who receive only electric service (electric only); those who receive both electric and gas service (combination/electric and gas); and those who receive only gas service (gas only). PECO also reports the electric and gas data separately. In order to split the second group (combination/electric and gas) for some of the data variables, PECO uses an allocation factor consistent with PECO's gas base rate filing of Mar. 31, 2008. The updated annual allocation factor for 2020 splits the combination group into 85% electric and 15% gas.

Responsible Utility Customer Protection Act

Act 201 of 2004¹⁸ changed the rules that apply to cash deposits, reconnection of service, termination of service, payment arrangements, and the filing of termination complaints by consumers for electric, gas, and water. The goal was to increase timely collections while ensuring that service is available to all customers based on equitable terms and conditions.¹⁹ The law is applicable to EDCs, water distribution utilities, and NGDCs with an annual operating income in excess of \$6,000,000.²⁰ Steam and wastewater utilities are not covered by Chapter 14. On Oct. 22, 2014, Chapter 14 was revised and renewed for a period of 10 years. The Commission recently amended Chapter 56 to make these regulations consistent with new Chapter 14.²¹ BCS is required to provide a Report detailing the impact of Chapter 14 every five years. The first quinquennial report, *The Sixth Report To The General Assembly And The Governor Pursuant To Section* 1415 – Implementation Of Chapter 14, was provided to the General Assembly and the Governor on Jan. 31, 2020. ²² The next report is due in December 2024.

¹⁶ See *Final Policy Statement and Order*, Docket No. M 2019-3012599 (order and annex entered on Nov. 5, 2019).

¹⁷ The amendments to the CAP Policy Statement also reflect considerations and deliberations from the numerous utility-specific universal service and energy conservation plan proceedings and independent third-party reviews of universal service results that have taken places for over twenty years.

¹⁸ 66 Pa.C.S. §§ 1401-1418

¹⁹ 66 Pa. C.S. § 1402

²⁰ Small natural gas distribution utilities may voluntarily "opt in" to Chapter 14. 66 Pa. C.S. § 1403.

²¹ Docket No. L-2015-2508421, published in Pennsylvania Bulletin Jun. 1, 2019.

²² http://www.puc.pa.gov/general/publications_reports/pdf/Chapter14-Biennial013020.pdf

COVID-19 Pandemic and Utility Termination Moratorium

The EDC and NGDC data presented in this report cannot be adequately analyzed without first acknowledging the impact of the COVID-19 pandemic in 2020. The unprecedented challenges presented by the global pandemic resulted in operational adjustments at the utilities, which may have influenced collections and universal service metrics reported by utilities in 2020 compared to previous years.

To address public health and safety concerns, on Mar. 6, 2020, Governor Tom Wolf issued a Proclamation of Disaster Emergency in response to the COVID-19 pandemic (*Emergency Proclamation*).²³ On Mar. 13, 2020, Chairman Gladys Brown Dutrieuille issued an *Emergency Order* which prohibited jurisdictional utilities from terminating service for the duration of the *Emergency Proclamation* unless termination of service is necessary to ameliorate a safety emergency or unless otherwise determined by the Commission. The *Emergency Order* also encouraged utilities to reconnect previously terminated service if such action could be done safely.²⁴

On Oct. 13, 2020, the Commission entered an Order modifying the *Emergency Order* by initiating Phase 2 of the public utility service termination moratorium (October 2020 Order).²⁵ The October 2020 Order lifted the termination moratorium for certain customers effective Nov. 9, 2020, but continued the termination moratorium for "protected customers" at or below 300% of the FPIG, under certain conditions, and established protections for certain residential and small business customers. The termination moratorium and protections established by the October 2020 Order expired on Mar. 31, 2021.

As reflected in the data presented in the following report, collections and universal service metrics were impacted in 2020 due to the direct and indirect effects of the COVID-19 pandemic and efforts to address the public health crisis. This includes EDCs and NGDCs conducting fewer terminations and reconnections in 2020 compared to previous years. EDCs and NGDCs also helped customers obtain or maintain assistance during the pandemic by temporarily waiving documentation requirements and expanding income eligibility for some universal service programs, which may have increased program participation compared to prior years. The COVID-19 pandemic may have impacted other 2020 collections and universal service programs performance metrics as well, such as payments arrangements, customer arrears, and jobs performed in LIURP.

Comparison of 2020 Data to Prior Years

As in prior years, this report provides a three-year comparison for most collections and universal service programs performance metrics. Previous reports have also included a column showing the percentage change for the metric over this three-year period. The "percent change" column has been removed from this report for two reasons. First, as described above, the COVID-19 pandemic and actions taken by the Commission and utilities to assist consumers in need impacted collections and universal service program data for 2020 and makes a direct comparison to prior years less meaningful. Second, the internal mergers of natural gas utilities (i.e., Peoples Natural Gas and UGI Utilities – Gas) have changed the way they report data in 2020. The 2020 data is not directly comparable to data reported by these public utilities in prior years.

²³ https://www.governor.pa.gov/wp-content/uploads/2020/03/20200306-COVID19-Digital-Proclamation.pdf

²⁴ See Public Utility Service Termination Moratorium Proclamation of Disaster Emergency-COVID-19, Docket No. M-2020-3019244 (Emergency Order ratified on Mar. 26, 2020).

²⁵ See Public Utility Service Termination Moratorium - Modification of March 13th Emergency Order, Docket No. M-2020-3019244 (Order entered on Oct. 13, 2020).

²⁶ For example: See PPL Petition at Docket No. M-2016-2554787 (Secretarial Letter issued on Mar. 30, 2020); and Duquesne Petition at Docket Nos. M-2016-2534323 and P-2020-3019460 (Secretarial Letter issued on Apr. 17, 2020).

2. Collection Performance

The regulations require EDCs and NGDCs to report various residential and confirmed low-income collection data. The following report reviews each of the collection metrics and uses the data to arrive at calculated variables that are more useful in analyzing trends in collection performance. All of the data and statistics used in this chapter are drawn from information submitted by the EDCs and NGDCs. It is also important to note that we have reflected both the number of confirmed low-income customers and the number of estimated low-income customers in a public utility's given service territory. Industry averages may be calculated based on category totals and may not represent an average of counts shown in the tables. Additionally, some totals may be affected by rounding.

Number of Residential Customers

The number of residential customers represents an average of the 12 months of month-end data reported by the EDCs and NGDCs. The data includes all residential customers, including universal service program recipients.

Number of Residential Electric Customers - 2018-2020

Utility	2018 Residential Customers	2019 Residential Customers	2020 Residential Customers
Duquesne	535,487	538,534	541,210
Met-Ed	502,110	504,684	508,754
PECO-Electric	1,476,268	1,488,812	1,502,478
Penelec	501,456	500,877	501,634
Penn Power	145,285	146,017	147,020
PPL	1,227,683	1,233,836	1,243,502
West Penn	626,454	627,499	630,038
Total/Industry Average	5,014,743	5,040,259	5,074,636

Number of Residential Natural Gas Customers - 2018-2020

Utility	2018 Residential Customers	2019 Residential Customers	2020 Residential Customers
Columbia	396,835	400,043	405,653
NFG	197,108	196,778	197,945
PECO-Gas	480,731	484,678	490,074
Peoples*	334,790	335,583	591,996
Peoples-Equitable*	248,408	247,801	n/a
PGW	477,533	480,347	486,934
UGI Utilities – Gas*	n/a	n/a	604,375
UGI South	361,789	367,175	n/a
UGI North	156,554	157,025	n/a
Total/Industry Average*	2,653,748	2,669,430	2,776,977

^{*}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

Number of Confirmed Low-Income Electric Customers – 2020

Utility	Number of Confirmed Low-Income Customers	Percent of Residential Customers
Duquesne	47,619	8.8%
Met-Ed	73,106	14.4%
PECO-Electric	135,579	9.0%
Penelec	90,218	18.0%
Penn Power	19,902	13.5%
PPL	193,879	15.6%
West Penn	75,210	11.9%
Total/Industry Average	635,513	12.5%

Number of Confirmed Low-Income Natural Gas Customers – 2020

Utility	Number of Confirmed Low-Income Customers	Percent of Residential Customers
Columbia	68,078	16.8%
NFG	35,241	17.8%
PECO-Gas	26,216	5.3%
Peoples*	108,540	18.3%
PGW	133,785	27.5%
UGI Utilities – Gas*	77,553	12.8%
Total/Industry Average*	449,413	16.2%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Number of Confirmed Low-Income Electric Customers – 2018-2020

Utility	2018 Number of Confirmed Low-Income Customers	2019 Number of Confirmed Low-Income Customers	2020 Number of Confirmed Low-Income Customers
Duquesne	49,346	48,373	47,619
Met-Ed	72,200	73,647	73,106
PECO-Electric	146,100	139,655	135,579
Penelec	90,502	91,350	90,218
Penn Power	20,087	20,221	19,902
PPL	189,826	189,683	193,879
West Penn	72,291	74,203	75,210
Total/Industry Average	640,352	637,132	635,513

Number of Confirmed Low-Income Natural Gas Customers – 2018-2020

Utility	2018 Number of Confirmed Low-Income Customers	2019 Number of Confirmed Low-Income Customers	2020 Number of Confirmed Low-Income Customers
Columbia	67,590	67,582	68,078
NFG*	30,661	32,282	35,241
PECO-Gas	25,704	24,977	26,216
Peoples**	60,262	67,718	108,540
Peoples-Equitable**	44,714	41,585	n/a
PGW	149,217	147,014	133,785
UGI Utilities – Gas**	n/a	n/a	77,553
UGI South	34,802	39,108	n/a
UGI North	21,958	24,934	n/a
Total/Industry Average**	434,908	445,200	449,413

^{*}NFG submitted corrected 2018 and 2019 CLI customer counts. The previous counts did not include customers enrolled in CAP.

Percentage of Confirmed Low-Income Electric Customers – 2018-2020

Utility	2018 Percentage of Confirmed Low-Income Customers	2019 Percentage of Confirmed Low-Income Customers	2020 Percentage of Confirmed Low-Income Customers
Duquesne	9.2%	9.0%	8.8%
Met-Ed	14.4%	14.6%	14.4%
PECO-Electric	9.9%	9.4%	9.0%
Penelec	18.0%	18.2%	18.0%
Penn Power	13.8%	13.8%	13.5%
PPL	15.5%	15.4%	15.6%
West Penn	11.5%	11.8%	11.9%
Total/Industry Average	12.8%	12.6%	12.5%

^{**}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percentage of Confirmed Low-Income Natural Gas Customers - 2018-2020

Utility	2018 Percentage of Confirmed Low-Income Customers	2019 Percentage of Confirmed Low-Income Customers	2020 Percentage of Confirmed Low-Income Customers
Columbia	17.0%	16.9%	16.8%
NFG*	15.6%	16.4%	17.8%
PECO-Gas	5.3%	5.2%	5.3%
Peoples**	18.0%	20.2%	18.3%
Peoples-Equitable**	18.0%	16.8%	n/a
PGW	31.2%	30.6%	27.5%
UGI Utilities – Gas**	n/a	n/a	12.8%
UGI South	9.6%	10.7%	n/a
UGI North	14.0%	15.9%	n/a
Total/Industry Average**	16.4%	16.7%	16.2%

^{*}NFG submitted corrected 2018 and 2019 CLI customer counts. The previous counts did not include customers enrolled in CAP.

The number of estimated low-income customers represents the public utility's approximation of its total (maximum) population of low-income customers in its service territory and is based on the latest census data available at the time of reporting. Census data is compiled by Pennsylvania State University annually and sent to the Commission for distribution to the EDCs and NGDCs for use in determining the estimated number of low-income customers.

Number of Estimated Low-Income Electric Customers – 2020

Utility	Number of Estimated Low-Income Customers	Estimated Percent of Residential Customers
Duquesne	103,434	19.1%
Met-Ed	113,660	22.3%
PECO-Electric	388,000	25.8%
Penelec	151,836	30.3%
Penn Power	35,146	23.9%
PPL	299,496	24.1%
West Penn	154,975	24.6%
Total/Industry Average	1,246,547	24.6%

^{**}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Number of Estimated Low-Income Natural Gas Customers – 2020

Utility	Number of Estimated Low-Income Customers	Estimated Percent of Residential Customers
Columbia	96,648	23.8%
NFG	59,860	30.2%
PECO-Gas	80,638	16.5%
Peoples*	152,309	25.7%
PGW	195,215	40.1%
UGI Utilities – Gas*	151,918	25.1%
Total/Industry Average*	736,588	26.5%

^{*}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

Number of Estimated Low-Income Electric Customers – 2018-2020

Utility	2018 Number of Estimated Low-Income Customers	2019 Number of Estimated Low-Income Customers	2020 Number of Estimated Low-Income Customers
Duquesne	95,316	103,720	103,434
Met-Ed	126,816	116,570	113,660
PECO-Electric	389,621	393,662	388,000
Penelec	166,285	155,072	151,836
Penn Power	38,733	35,872	35,146
PPL	258,786	269,535	299,496
West Penn	172,244	157,491	154,975
Total/Industry Average	1,247,801	1,231,922	1,246,547

Number of Estimated Low-Income Natural Gas Customers – 2018-2020

Utility	2018 Number of Estimated Low-Income Customers	2019 Number of Estimated Low-Income Customers	2020 Number of Estimated Low-Income Customers
Columbia	99,925	97,268	96,648
NFG	59,009	60,947	59,860
PECO-Gas	74,121	74,914	80,638
Peoples*	77,002	84,437	152,309
Peoples-Equitable*	54,650	58,791	n/a
PGW	206,533	197,855	195,215
UGI Utilities – Gas*	n/a	n/a	151,918
UGI South	90,220	86,314	n/a
UGI North	47,882	46,297	n/a
Total/Industry Average*	709,342	706,823	736,588

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percentage of Estimated Low-Income Electric Customers - 2018-2020

Utility	2018 Percentage of Estimated Low-Income Customers	2019 Percentage of Estimated Low-Income Customers	2020 Percentage of Estimated Low-Income Customers
Duquesne	17.8%	19.3%	19.1%
Met-Ed	25.3%	23.1%	22.3%
PECO-Electric	26.4%	26.4%	25.8%
Penelec	33.2%	31.0%	30.3%
Penn Power	26.7%	24.6%	23.9%
PPL	21.1%	21.8%	24.1%
West Penn	27.5%	25.1%	24.6%
Total/Industry Average	24.9%	24.4%	24.6%

Percentage of Estimated Low-Income Natural Gas Customers - 2018-2020

Utility	2018 Percentage of Estimated Low-Income Customers	2019 Percentage of Estimated Low-Income Customers	2020 Percentage of Estimated Low-Income Customers
Columbia	25.2%	24.3%	23.8%
NFG	29.9%	31.0%	30.2%
PECO-Gas	15.4%	15.5%	16.5%
Peoples*	23.0%	25.2%	25.7%
Peoples-Equitable*	22.0%	23.7%	n/a
PGW	43.2%	41.2%	40.1%
UGI Utilities – Gas*	n/a	n/a	25.1%
UGI South	24.9%	23.5%	n/a
UGI North	30.6%	29.5%	n/a
Total/Industry Average*	26.7%	26.5%	26.5%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Payment Troubled Customers

A **payment troubled customer** is a customer who has failed to maintain one or more payment arrangements in a 1-year period.²⁷ A **payment arrangement**²⁸ is an arrangement in which a customer who admits liability for billed service is permitted to pay the unpaid balance in one or more payments. Absent a change in income, the PUC can only offer a second payment arrangement to a payment troubled customer when all "catch-up" arrears are paid, or when a previous arrangement has been satisfied.²⁹ The public utilities have no restrictions on the number or terms of any payment arrangements they may choose to offer to payment troubled customers.

²⁷ 52 Pa. Code § 54.72 or § 62.2

²⁸ 52 Pa. Code § 56.2

²⁹ 66 Pa. C.S. § 1405(d)

The following tables reflect an average of the 12 months of month-end data reported by the EDCs and NGDCs for payment troubled customer totals, ³⁰ and include both residential and the confirmed low-income subcategory to allow for the presentation of the percent of payment troubled customers which are confirmed low-income.

Electric Payment Troubled Customers - 2020

Utility	Residential	Confirmed Low-Income	Percent of Payment Troubled Customers which are Confirmed Low-Income
Duquesne	113	14	12.4%
Met-Ed	426	280	65.7%
PECO-Electric	1,188	200	16.8%
Penelec	406	275	67.7%
Penn Power	107	72	67.3%
PPL	184,646	63,591	34.4%
West Penn	426	269	63.1%
Total/Industry Average	187,312	64,701	34.5%

Natural Gas Payment Troubled Customers - 2020

Utility	Residential	Confirmed Low-Income	Percent of Payment Troubled Customers which are Confirmed Low-Income
Columbia	12,775	7,689	60.2%
NFG	8,645	4,562	52.8%
PECO-Gas	402	66	16.4%
Peoples*	19,732	9,514	48.2%
PGW	32,598	27,283	83.7%
UGI Utilities – Gas*	19,362	18,815	97.2%
Total/Industry Average*	93,514	67,929	72.6%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Number of Payment Arrangements

The method³¹ by which EDCs and NGDCs determine the total number of payment arrangements for reporting also takes into consideration the limitations in documenting and tracking payment arrangements. This sometimes results in treating a broken payment arrangement that is reinstated due to a "catch-up" payment as a new payment arrangement. Utility and PUC-granted payment arrangement requests are both included in this category. However, CAP payment plans are not included in the count of payment arrangements.

The following tables reflect year-end payment arrangement totals, and include both residential and confirmed low-income categories to allow for the presentation of the percent of payment arrangements which are confirmed low-income.

³⁰ 52 Pa. Code § 54.75(1)(vii) or § 62.5(a)(1)(x)

³¹ 52 Pa. Code § 54.75(1)(i) or § 62.5(a)(1)(i)

Electric Payment Arrangements – 2020

Utility	Residential	Confirmed Low-Income	Percent of Payment Arrangements which are Confirmed Low-Income
Duquesne	17,124	2,503	14.6%
Met-Ed	25,161	14,257	56.7%
PECO-Electric	43,195	3,565	8.3%
Penelec	23,699	14,310	60.4%
Penn Power	5,683	3,272	57.6%
PPL	70,975	46,413	65.4%
West Penn	24,260	13,578	56.0%
Total/Industry Average	210,097	97,898	46.6%

Natural Gas Payment Arrangements – 2020

Utility	Residential	Confirmed Low-Income	Percent of Payment Arrangements which are Confirmed Low-Income
Columbia	20,541	12,041	58.6%
NFG	6,374	3,067	48.1%
PECO-Gas	17,298	1,147	6.6%
Peoples*	13,162	5,603	42.6%
PGW	20,753	15,161	73.1%
UGI Utilities – Gas*	12,746	9,835	77.2%
Total/Industry Average*	90,874	46,854	51.6%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Electric Payment Arrangements – Residential Electric Customers – 2018-2020

Utility	2018 Payment Arrangements	2019 Payment Arrangements	2020 Payment Arrangements
Duquesne	33,334	30,880	17,124
Met-Ed	43,034	42,338	25,161
PECO-Electric	65,525	63,217	43,195
Penelec	43,057	42,414	23,699
Penn Power	9,824	9,622	5,683
PPL	120,568	116,072	70,975
West Penn	41,747	41,596	24,260
Total/Industry Average	357,089	346,139	210,097

Natural Gas Payment Arrangements - Residential Natural Gas Customers - 2018-2020

Utility	2018 Payment Arrangements	2019 Payment Arrangements	2020 Payment Arrangements
Columbia	27,781	27,086	20,541
NFG	18,357	18,604	6,374
PECO-Gas	25,443	25,408	17,298
Peoples*	24,992	13,520	13,162
Peoples-Equitable*	18,539	10,022	n/a
PGW	85,067	68,940	20,753
UGI Utilities – Gas*	n/a	n/a	12,746
UGI South**	25,817	16,382	n/a
UGI North**	13,958	9,562	n/a
Total/Industry Average*	239,954	189,524	90,874

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Electric Payment Arrangements – Confirmed Low-Income Electric Customers – 2018-2020

Utility	2018 Payment Arrangements	2019 Payment Arrangements	2020 Payment Arrangements
Duquesne	8,622	5,686	2,503
Met-Ed	25,657	25,996	14,257
PECO-Electric	9,317	9,275	3,565
Penelec	28,662	28,802	14,310
Penn Power	6,157	6,261	3,272
PPL	76,896	73,152	46,413
West Penn	23,787	28,802	13,578
Total/Industry Average	179,098	177,974	97,898

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Natural Gas Payment Arrangements – Confirmed Low-Income Natural Gas Customers – 2018-2020

Utility	2018 Payment Arrangements	2019 Payment Arrangements	2020 Payment Arrangements
Columbia	15,735	15,977	12,041
NFG	11,522	9,915	3,067
PECO-Gas	2,531	2,593	1,147
Peoples*	7,877	6,078	5,603
Peoples-Equitable*	9,425	4,772	n/a
PGW	61,532	48,912	15,161
UGI Utilities – Gas*	n/a	n/a	9,835
UGI South**	23,241	15,218	n/a
UGI North**	12,527	8,825	n/a
Total/Industry Average*	144,390	112,290	46,854

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Termination of Service

Termination of public utility service is the most serious consequence of customer nonpayment and is viewed as a last resort when customers fail to meet their payment obligations. The termination rate is calculated by dividing the number of service terminations by the number of residential customers, allowing for a comparison of termination activities regardless of the number of residential consumers. Any significant increase in a termination rate could indicate a trend or pattern that the Commission may need to investigate.

Due to the direct and indirect effects of the COVID-19 pandemic and efforts to address the public health crisis, electric and natural gas terminations were significantly reduced for 2020. Utilities were not permitted to terminate service beginning Mar. 13, 2020. Utilities were only permitted to terminate non-protected customers (e.g., customers with incomes exceeding 300% of the FPIG) beginning Nov. 9, 2020.

Terminations - Residential Electric Customers - 2018-2020

Utility	2018 Terminations	2019 Terminations	2020 Terminations
Duquesne	26,119	27,688	0
Met-Ed	24,099	26,076	848
PECO-Electric	84,893	92,497	80
Penelec	19,949	21,065	850
Penn Power	4,089	4,293	174
PPL	44,971	53,340	1,502
West Penn	13,577	19,743	909
Total/Industry Average	217,697	244,702	4,363

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Terminations - Residential Natural Gas Customers - 2018-2020

Utility	2018 Terminations	2019 Terminations	2020 Terminations
Columbia	10,859	10,770	12
NFG	6,449	7,533	0
PECO-Gas	19,815	22,036	30
Peoples*	9,707	11,255	823
Peoples-Equitable*	8,622	9,444	n/a
PGW	25,576	29,048	0
UGI Utilities – Gas*	n/a	n/a	357
UGI South**	15,924	10,657	n/a
UGI North**	8,243	6,652	n/a
Total/Industry Average*	105,195	107,395	1,222

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Terminations - Confirmed Low-Income Electric Customers - 2018-2020

Utility	2018 Terminations	2019 Terminations	2020 Terminations
Duquesne	7,600	6,696	0
Met-Ed*	13,246	14,112	0
PECO-Electric	22,657	21,081	0
Penelec*	12,561	13,335	0
Penn Power*	2,431	2,636	0
PPL	27,433	35,659	0
West Penn*	7,631	11,312	0
Total/Industry Average	93,559	104,831	0

^{*2018} and 2019 CLI termination counts for FirstEnergy utilities include customers who verified their low-income income status after service termination. CLI termination counts for 2020 reflect only customers who were identified as CLI at the time of termination.

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Terminations - Confirmed Low-Income Natural Gas Customers - 2018-2020

Utility	2018 Terminations	2019 Terminations	2020 Terminations
Columbia	6,314	6,067	0
NFG	3,710	4,106	0
PECO-Gas	4,990	4,734	0
Peoples*	2,366	2,226	0
Peoples-Equitable*	1,527	2,003	n/a
PGW	17,567	19,724	0
UGI Utilities – Gas*	n/a	n/a	0
UGI South**	593	597	n/a
UGI North**	513	586	n/a
Total/Industry Average*	37,580	40,043	0

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Termination Rate - Residential Electric Customers - 2018-2020

Utility	2018 Termination Rate	2019 Termination Rate	2020 Termination Rate
Duquesne	4.9%	5.1%	0.0%
Met-Ed	4.8%	5.2%	0.2%
PECO-Electric	5.8%	6.2%	<0.1%
Penelec	4.0%	4.2%	0.2%
Penn Power	2.8%	2.9%	0.1%
PPL	3.7%	4.3%	0.1%
West Penn	2.2%	3.1%	0.1%
Total/Industry Average	4.3%	4.9%	0.1%

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Termination Rate - Residential Natural Gas Customers - 2018-2020

Utility	2018 Termination Rate	2019 Termination Rate	2020 Termination Rate
Columbia	2.7%	2.7%	<0.1%
NFG	3.3%	3.8%	0.0%
PECO-Gas	4.1%	4.5%	<0.1%
Peoples*	2.9%	3.4%	0.1%
Peoples-Equitable*	3.5%	3.4%	n/a
PGW	5.4%	6.0%	0%
UGI Utilities – Gas*	n/a	n/a	<0.1%
UGI South**	4.4%	2.9%	n/a
UGI North**	5.3%	4.2%	n/a
Total/Industry Average*	4.0%	4.0%	<0.1%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Termination Rate - Confirmed Low-Income Electric Customers - 2018-2020

Utility	2018 Termination Rate	2019 Termination Rate	2020 Termination Rate
Duquesne	15.4%	13.8%	0.0%
Met-Ed	18.3%	19.2%	0.0%
PECO-Electric	15.5%	15.1%	0.0%
Penelec	13.9%	14.6%	0.0%
Penn Power	12.1%	13.0%	0.0%
PPL	14.5%	18.8%	0.0%
West Penn	10.6%	15.2%	0.0%
Total/Industry Average	14.6%	16.5%	0.0%

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Termination Rate - Confirmed Low-Income Natural Gas Customers - 2018-2020

Utility	2018 Termination Rate	2019 Termination Rate	2020 Termination Rate
Columbia	9.3%	9.0%	0.0%
NFG*	12.1%	12.7%	0.0%
PECO-Gas	19.4%	19.0%	0.0%
Peoples**	3.9%	3.3%	0.0%
Peoples-Equitable**	3.4%	4.8%	n/a
PGW	11.8%	13.4%	0.0%
UGI Utilities – Gas**	n/a	n/a	0.0%
UGI South***	1.7%	1.5%	n/a
UGI North***	2.3%	2.4%	n/a
Total/Industry Average**	8.6%	9.0%	0.0%

^{*}NFG submitted corrected 2018 and 2019 CLI customer counts. The previous counts did not include customers enrolled in CAP.

Reconnection of Service

Reconnection of service occurs when customers either pay their debt in full or make a significant upfront payment to the public utility and agree to a payment arrangement for the balance owed. The **reconnection rate** is calculated by dividing the number of service reconnections by the number of terminations, allowing for a comparison of reconnection activities regardless of the number of residential consumers. The result is generally indicative of the success of a customer, whose service has been terminated, at getting service reconnected. Due to the direct and indirect effects of the COVID-19 pandemic and efforts to address the public health crisis, EDCs and NGDCs reported fewer service terminations and reconnections in 2020 compared to previous years.

Reconnections - Residential Electric Customers - 2018-2020

Utility	2018 Reconnections	2019 Reconnections	2020 Reconnections
Duquesne	19,522	21,468	0
Met-Ed	19,916	22,325	485
PECO-Electric	71,461	78,630	1,157
Penelec	14,882	16,095	480
Penn Power	3,186	3,449	85
PPL	31,666	39,001	840
West Penn	10,104	15,308	536
Total/Industry Average	170,737	196,276	3,583

^{**}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

^{***}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Reconnections – Residential Natural Gas Customers – 2018-2020

Utility	2018 Reconnections	2019 Reconnections	2020 Reconnections
Columbia	6,054	6,153	235
NFG	4,224	4,926	167
PECO-Gas	17,621	19,353	162
Peoples*	6,658	7,648	988
Peoples-Equitable*	6,055	6,598	n/a
PGW	17,657	20,986	1,256
UGI Utilities – Gas*	n/a	n/a	579
UGI South**	10,806	7,825	n/a
UGI North**	5,539	4,839	n/a
Total/Industry Average*	74,614	78,328	3,387

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Reconnections – Confirmed Low-Income Electric Customers – 2018-2020

Utility	2018 Reconnections	2019 Reconnections	2020 Reconnections
Duquesne	5,875	5,499	0
Met-Ed	9,931	11,242	95
PECO-Electric	20,212	19,165	121
Penelec	8,567	9,511	98
Penn Power	1,620	1,911	24
PPL	20,351	27,022	0
West Penn	5,056	8,165	104
Total/Industry Average	71,612	82,515	442

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Reconnections – Confirmed Low-Income Natural Gas Customers – 2018-2020

Utility	2018 Reconnections	2019 Reconnections	2020 Reconnections
Columbia	3,133	3,134	51
NFG	1,783	2,920	89
PECO-Gas	4,252	4,234	15
Peoples*	1,736	1,589	405
Peoples-Equitable*	1,090	1,560	n/a
PGW	13,404	15,549	701
UGI Utilities – Gas*	n/a	n/a	56
UGI South**	691	857	n/a
UGI North**	548	777	n/a
Total/Industry Average*	26,637	30,620	1,317

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Reconnection Rate - Residential Electric Customers - 2018-2020

Utility	2018 Reconnection Rate	2019 Reconnection Rate	2020 Reconnection Rate
Duquesne	74.7%	77.5%	n/a
Met-Ed	82.6%	85.6%	57.2%
PECO-Electric	84.2%	85.0%	1,446.3%
Penelec	74.6%	76.4%	56.5%
Penn Power	77.9%	80.3%	48.9%
PPL	70.4%	73.1%	55.9%
West Penn	74.4%	77.5%	59.0%
Total/Industry Average	78.4%	80.2%	82.1%

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Reconnection Rate - Residential Natural Gas Customers - 2018-2020

Utility	2018 Reconnection Rate	2019 Reconnection Rate	2020 Reconnection Rate
Columbia	55.8%	57.1%	1,958.3%
NFG	65.5%	65.4%	n/a
PECO-Gas	88.9%	87.8%	540.0%
Peoples*	68.6%	68.0%	n/a
Peoples-Equitable*	70.2%	69.9%	n/a
PGW	69.0%	72.2%	n/a
UGI Utilities – Gas*	n/a	n/a	162.2%
UGI South**	67.9%	73.4%	n/a
UGI North**	67.2%	72.7%	n/a
Total/Industry Average*	70.9%	72.9%	277.2%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Reconnection Rate - Confirmed Low-Income Electric Customers - 2018-2020

Utility	2018 Reconnection Rate	2019 Reconnection Rate	2020 Reconnection Rate
Duquesne	77.3%	82.1%	n/a
Met-Ed	75.0%	79.7%	n/a
PECO-Electric	89.2%	90.9%	n/a
Penelec	68.2%	71.3%	n/a
Penn Power	66.6%	72.5%	n/a
PPL	74.2%	75.8%	n/a
West Penn	66.3%	72.2%	n/a
Total/Industry Average	76.5%	78.7%	n/a

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Reconnection Rate - Confirmed Low-Income Natural Gas Customers - 2018-2020

Utility	2018 Reconnection Rate	2019 Reconnection Rate	2020 Reconnection Rate
Columbia	49.6%	51.7%	n/a
NFG	48.1%	71.1%	n/a
PECO-Gas	85.2%	89.4%	n/a
Peoples*	73.4%	71.4%	n/a
Peoples-Equitable*	71.4%	77.9%	n/a
PGW	76.3%	78.8%	n/a
UGI Utilities – Gas*	n/a	n/a	n/a
UGI South**	116.5%	143.6%	n/a
UGI North**	106.8%	132.6%	n/a
Total/Industry Average*	69.6%	76.5%	n/a

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Number of Customers in Debt

Two categories exist for reporting utility customers in debt. The first includes customers who are on a payment arrangement, and the second includes customers who are not on a payment arrangement. Those "on a payment arrangement" include both public utility and PUC-granted payment arrangements. Debt that is on a payment arrangement is considered active and is often easier to collect than debt not on a payment arrangement. Debt that is not on a payment arrangement can become "uncollectable debt." Uncollectable debt often leads to an increase in gross write-offs, which are recovered across all ratepayers in public utility rates.

Many factors affect the number of customers in debt, including customer income level and ability to pay, public utility collection practices, public utility termination practices, and the affordability of customer bills. Public utility collection policies vary and therefore also influence the "overdue" or "in debt" categorization.

One of the stated purposes of the Chapter 56 regulations³² is to "provide functional alternatives to termination." Customers who make a payment arrangement on an outstanding balance have acknowledged that they are aware of the outstanding debt, and have avoided any imminent threat of termination.

Two factors affect the uniformity of the data reported regarding the number of overdue customers and the dollars in debt associated with those customers. First, EDCs and NGDCs use different methods for determining when an account is overdue. EDCs and NGDCs consider either the due date of the bill or the transmittal date of the bill to be day zero. The transmittal date is 20 days before the due date. For USRR comparative purposes, EDCs and NGDCs are requested to consider the due date as day zero and to report debt that is at least 30 days overdue.

Duquesne Light, Met-Ed, Penelec, Penn Power, West Penn, Columbia, Peoples, and UGI Utilities – Gas reported according to the method requested. The variance among the other EDCs and NGDCs shows a difference of no more than 20 days from that method. PECO Electric and Gas, PPL, and PGW report debt that is 10 days old, meaning these utilities are overstating the debt compared to EDCs and NGDCs that reported debt as 30 days overdue. NFG reports debt that is about 40 days old, meaning NFG is understating its debt relative to the other utilities.

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

³² 52 Pa. Code § 56.1

The second factor affecting the arrearage data uniformity is when an EDC or NGDC moves a terminated or discontinued account from active status (included in the reporting) to inactive status (excluded from the reporting). EDC and NGDC collection policies and accounting practices affect the timing.

See Appendix 1 for a chart showing the different methods EDCs and NGDCs use to determine overdue accounts and how they compare to the preferred method (30 days overdue). See Appendix 2 for the methods EDCs and NGDCs use to determine when an account is removed from active status after termination of service or discontinuance of service.

CAP recipients are excluded from all data tables referencing the number of customers in debt, the dollars in debt, and gross residential write-offs.

The number of residential and confirmed low-income customers in debt on arrangement and not on arrangement represents an average of the 12 months of month-end data reported by the EDCs and NGDCs. Total number of customers in debt may be slightly off due to rounding of figures in the categories on arrangement and not on arrangement.

Number of Residential Electric Customers in Debt - 2020

Utility	Number of Customers in Debt on an Arrangement	Number of Customers in Debt Not on an Arrangement	Total of Customers in Debt
Duquesne	11,757	39,245	51,002
Met-Ed	19,362	32,644	52,006
PECO-Electric	18,813	107,521	126,334
Penelec	20,451	35,889	56,340
Penn Power	4,810	8,460	13,270
PPL	47,006	137,655	184,661
West Penn	21,038	38,908	59,946
Total/Industry Average	143,237	400,322	543,559

Number of Residential Natural Gas Customers in Debt - 2020

Utility	Number of Customers in Debt on an Arrangement	Number of Customers in Debt Not on an Arrangement	Total of Customers in Debt
Columbia	15,207	15,769	30,976
NFG	16,080	18,131	34,211
PECO-Gas	7,257	28,170	35,427
Peoples*	13,040	36,421	49,461
PGW	8,638	77,988	86,625
UGI Utilities – Gas*	26,123	37,801	63,925
Total/Industry Average*	86,345	214,280	300,625

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Number of Confirmed Low-Income Electric Customers in Debt – 2020

Utility	Number of Customers in Debt on an Arrangement	Number of Customers in Debt Not on an Arrangement	Total of Customers in Debt
Duquesne	2,119	3,939	6,058
Met-Ed	12,822	16,171	28,992
PECO-Electric	2,838	4,002	6,840
Penelec	14,451	19,669	34,119
Penn Power	3,303	4,300	7,603
PPL	10,195	53,422	63,617
West Penn	13,917	18,752	32,669
Total/Industry Average	59,645	120,255	179,898

Number of Confirmed Low-Income Natural Gas Customers in Debt - 2020

Utility	Number of Customers in Debt on an Arrangement	Number of Customers in Debt Not on an Arrangement	Total of Customers in Debt
Columbia	7,349	4,746	12,096
NFG	7,634	6,442	14,076
PECO-Gas	1,024	1,165	2,189
Peoples*	6,945	10,168	17,113
PGW	5,265	3,950	9,215
UGI Utilities – Gas*	24,019	1,854	25,872
Total/Industry Average*	52,236	28,325	80,561

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Number of Residential Electric Customers in Debt - 2018-2020

Utility	2018 Total of Customers in Debt	2019 Total of Customers in Debt	2020 Total of Customers in Debt
Duquesne	44,432	42,078	51,002
Met-Ed	45,281	45,140	52,006
PECO-Electric	103,616	102,667	126,334
Penelec	50,665	50,830	56,340
Penn Power	11,993	12,173	13,270
PPL	206,835	196,086	184,661
West Penn	52,047	54,081	59,946
Total/Industry Average	514,869	503,055	543,559

Number of Residential Natural Gas Customers in Debt - 2018-2020

Utility	2018 Total of Customers in Debt	2019 Total of Customers in Debt	2020 Total of Customers in Debt
Columbia	27,327	27,447	30,976
NFG	26,784	30,410	34,211
PECO-Gas	26,877	26,294	35,427
Peoples*	26,118	24,939	49,461
Peoples-Equitable*	19,962	19,166	n/a
PGW	85,514	77,829	86,625
UGI Utilities – Gas*	n/a	n/a	63,925
UGI South**	47,420	41,305	n/a
UGI North**	22,274	19,876	n/a
Total/Industry Average*	282,276	267,266	300,625

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Number of Confirmed Low-Income Electric Customers in Debt – 2018-2020

Utility	2018 Total of Customers in Debt	2019 Total of Customers in Debt	2020 Total of Customers in Debt
Duquesne	6,748	5,205	6,058
Met-Ed	22,362	22,768	28,992
PECO-Electric	10,146	8,306	6,840
Penelec	27,959	28,371	34,119
Penn Power	6,221	6,414	7,603
PPL	65,670	63,708	63,617
West Penn	23,049	25,646	32,669
Total/Industry Average	162,155	160,418	179,898

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Number of Confirmed Low-Income Natural Gas Customers in Debt - 2018-2020

Utility	2018 Total of Customers in Debt	2019 Total of Customers in Debt	2020 Total of Customers in Debt
Columbia	10,749	10,992	12,096
NFG	9,369	11,477	14,076
PECO-Gas	2,519	2,300	2,189
Peoples*	9,588	8,795	17,113
Peoples-Equitable*	7,010	6,385	n/a
PGW	19,804	15,119	9,215
UGI Utilities – Gas*	n/a	n/a	25,872
UGI South	12,601	14,612	n/a
UGI North	7,135	8,374	n/a
Total/Industry Avg*	78,775	78,054	80,561

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percent of Customers in Debt

The **percent of customers in debt** is a useful statistic that highlights utility collection activity and the need for universal service programs. A public utility with a low percent of its residential customers in debt should experience better cash flow and have a better credit rating than one with a high percent of its residential customers in debt. The percent of customers in debt is calculated by dividing the number of customers in debt by the total number of residential customers. This calculation is done for both groups of customers in debt — those on a payment arrangement and those not on a payment arrangement. The total percent of customers in debt may be slightly off due to rounding of figures in the categories on arrangement and not on arrangement.

Percent of Total Residential Electric Customers in Debt - 2020

Utility	Customers in Debt on an Arrangement	Customers in Debt Not on an Arrangement	Total Percent of Customers in Debt
Duquesne	2.2%	7.3%	9.4%
Met-Ed	3.8%	6.4%	10.2%
PECO-Electric	1.3%	7.2%	8.4%
Penelec	4.1%	7.2%	11.2%
Penn Power	3.3%	5.8%	9.0%
PPL	3.8%	11.1%	14.9%
West Penn	3.3%	6.2%	9.5%
Total/Industry Average	2.8%	7.9%	10.7%

Percent of Total Residential Natural Gas Customers in Debt - 2020

Utility	Customers in Debt on an Arrangement	Customers in Debt Not on an Arrangement	Total Percent of Customers in Debt
Columbia	3.7%	3.9%	7.6%
NFG	8.1%	9.2%	17.3%
PECO-Gas	1.5%	5.7%	7.2%
Peoples*	2.2%	6.2%	8.4%
PGW	1.8%	16.0%	17.8%
UGI Utilities – Gas*	4.3%	6.3%	10.6%
Total/Industry Average*	3.1%	7.7%	10.8%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percent of Confirmed Low-Income Electric Customers in Debt – 2020

Utility	Customers in Debt on an Arrangement	Customers in Debt Not on an Arrangement	Total Percent of Customers in Debt
Duquesne	4.4%	8.3%	12.7%
Met-Ed	17.5%	22.1%	39.7%
PECO-Electric	2.1%	3.0%	5.0%
Penelec	16.0%	21.8%	37.8%
Penn Power	16.6%	21.6%	38.2%
PPL	5.3%	27.6%	32.8%
West Penn	18.5%	24.9%	43.4%
Total/Industry Average	9.4%	18.9%	28.3%

Percent of Confirmed Low-Income Natural Gas Customers in Debt - 2020

Utility	Customers in Debt on an Arrangement	Customers in Debt Not on an Arrangement	Total Percent of Customers in Debt
Columbia	10.8%	7.0%	17.8%
NFG	21.7%	18.3%	39.9%
PECO-Gas	3.9%	4.4%	8.3%
Peoples*	6.4%	9.4%	15.8%
PGW	3.9%	3.0%	6.9%
UGI Utilities – Gas*	31.0%	2.4%	33.4%
Total/Industry Average*	11.6%	6.4%	17.9%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percent of Total Residential Electric Customers in Debt – 2018-2020

Utility	Total Percent of Customers in Debt 2018	Total Percent of Customers in Debt 2019	Total Percent of Customers in Debt 2020
Duquesne	8.3%	7.8%	9.4%
Met-Ed	9.0%	8.9%	10.2%
PECO-Electric	7.0%	6.9%	8.4%
Penelec	10.1%	10.1%	11.2%
Penn Power	8.3%	8.3%	9.0%
PPL	16.8%	15.9%	14.9%
West Penn	8.3%	8.6%	9.5%
Total/Industry Average	10.3%	10.0%	10.7%

Percent of Total Residential Natural Gas Customers in Debt - 2018-2020

Utility	Total Percent of Customers in Debt 2018	Total Percent of Customers in Debt 2019	Total Percent of Customers in Debt 2020
Columbia	6.9%	6.9%	7.6%
NFG	13.6%	15.5%	17.3%
PECO-Gas	5.6%	5.4%	7.2%
Peoples*	7.8%	7.4%	8.4%
Peoples-Equitable*	8.0%	7.7%	n/a
PGW	17.9%	16.2%	17.8%
UGI Utilities – Gas*	n/a	n/a	10.6%
UGI South	13.1%	11.2%	n/a
UGI North	14.2%	12.7%	n/a
Total/Industry Average*	10.6%	10.0%	10.8%

^{*}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

Percent of Confirmed Low-Income Electric Customers in Debt - 2018-2020

Utility	Total Percent of Customers in Debt 2018	Total Percent of Customers in Debt 2019	Total Percent of Customers in Debt 2020
Duquesne	13.7%	10.8%	12.7%
Met-Ed	31.0%	30.9%	39.7%
PECO-Electric	6.9%	5.9%	5.0%
Penelec	30.9%	31.1%	37.8%
Penn Power	31.0%	31.7%	38.2%
PPL	34.6%	33.6%	32.8%
West Penn	31.9%	34.6%	43.4%
Total/Industry Average	25.3%	25.2%	28.3%

Percent of Confirmed Low-Income Natural Gas Customers in Debt - 2018-2020

Utility	Total Percent of Customers in Debt 2018	Total Percent of Customers in Debt 2019	Total Percent of Customers in Debt 2020
Columbia	15.9%	16.3%	17.8%
NFG*	30.6%	35.6%	39.9%
PECO-Gas	9.8%	9.2%	8.3%
Peoples**	15.9%	13.0%	15.8%
Peoples-Equitable**	15.7%	15.4%	n/a
PGW	13.3%	10.3%	6.9%
UGI Utilities – Gas**	n/a	n/a	33.4%
UGI South	36.2%	37.4%	n/a
UGI North	32.5%	33.6%	n/a
Total/Industry Average**	18.1%	17.5%	17.9%

^{*}NFG submitted corrected 2018 and 2019 CLI customer counts. The previous counts did not include customers enrolled in CAP.

Residential Customer Dollars in Debt

The amount of money owed has an impact on utility expenses, making up part of the public utility's distribution charge. Higher dollars in debt not on an **arrangement** represent a greater risk for those dollars to be uncollectible. The tables below represent a 12-month average of the totals reported at the end of each month. Total average dollars in debt may be slightly off due to rounding of figures in the categories on arrangement and not on arrangement.

Dollars in Debt - Residential Electric Customers - 2020

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Duquesne	\$13,593,107	\$14,217,074	\$27,810,181
Met-Ed	\$20,027,481	\$14,732,453	\$34,759,934
PECO-Electric	\$14,542,028	\$46,989,617	\$61,531,645
Penelec	\$23,054,887	\$16,161,015	\$39,215,902
Penn Power	\$5,732,484	\$3,932,674	\$9,665,159
PPL	\$24,813,543	\$86,479,219	\$111,292,761
West Penn	\$24,366,256	\$17,204,659	\$41,570,915
Total/Industry Average	\$126,129,786	\$199,716,711	\$325,846,497

^{**}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Dollars in Debt - Residential Natural Gas Customers - 2020

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Columbia	\$13,209,825	\$7,421,733	\$20,631,558
NFG	\$969,223	\$6,379,179	\$7,348,401
PECO-Gas	\$6,674,981	\$17,429,841	\$24,104,822
Peoples*	\$11,702,565	\$10,550,056	\$22,252,666
PGW	\$4,570,930	\$54,702,540	\$59,273,470
UGI Utilities – Gas*	\$20,498,260	\$9,927,392	\$30,425,652
Total/Industry Average*	\$57,625,784	\$106,410,741	\$164,036,569

^{*}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

Dollars in Debt - Confirmed Low-Income Electric Customers - 2020

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Duquesne	\$2,897,039	\$2,826,119	\$5,723,158
Met-Ed	\$14,333,443	\$9,693,101	\$24,026,543
PECO-Electric	\$2,857,111	\$4,978,412	\$7,835,523
Penelec	\$17,155,100	\$11,303,910	\$28,459,010
Penn Power	\$4,166,367	\$2,596,054	\$6,762,422
PPL	\$4,732,585	\$53,942,856	\$58,675,440
West Penn	\$17,434,625	\$11,421,826	\$28,856,451
Total/Industry Average	\$63,576,270	\$96,762,278	\$160,338,547

Dollars in Debt - Confirmed Low-Income Natural Gas Customers - 2020

Utility	Dollars in Debt on an Arrangement	Dollars in Debt Not on an Arrangement	Total Dollars in Debt
Columbia	\$7,635,198	\$2,581,987	\$10,217,185
NFG	\$471,583	\$3,269,648	\$3,741,231
PECO-Gas	\$1,254,463	\$1,848,498	\$3,102,961
Peoples*	\$6,527,715	\$4,053,882	\$10,563,135
PGW	\$2,562,611	\$3,967,389	\$6,530,000
UGI Utilities – Gas*	\$19,462,068	\$953,581	\$20,415,649
Total/Industry Average*	\$37,913,638	\$16,674,985	\$54,570,161

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Dollars in Debt – Residential Electric Customers – 2018-2020

Utility	2018 Total Dollars in Debt	2019 Total Dollars in Debt	2020 Total Dollars in Debt
Duquesne	\$19,462,675	\$16,130,130	\$27,810,181
Met-Ed	\$19,924,206	\$20,270,119	\$34,759,934
PECO-Electric	\$28,207,515	\$31,378,347	\$61,531,645
Penelec	\$22,658,514	\$23,838,275	\$39,215,902
Penn Power	\$5,904,875	\$6,263,993	\$9,665,159
PPL	\$92,356,281	\$84,206,219	\$111,292,761
West Penn	\$21,179,368	\$23,985,129	\$41,570,915
Total/Industry Average	\$209,693,434	\$206,072,212	\$325,846,497

Dollars in Debt - Residential Natural Gas Customers - 2018-2020

Utility	2018 Total Dollars in Debt	2019 Total Dollars in Debt	2020 Total Dollars in Debt
Columbia	\$13,855,849	\$14,939,587	\$20,631,558
NFG	\$5,106,543	\$5,442,224	\$7,348,401
PECO-Gas	\$10,294,587	\$12,005,078	\$24,104,822
Peoples*	\$5,804,741	\$6,071,462	\$22,252,666
Peoples-Equitable*	\$3,832,780	\$4,117,180	n/a
PGW	\$42,144,065	\$39,572,383	\$59,273,470
UGI Utilities – Gas*	n/a	n/a	\$30,425,652
UGI South**	\$13,931,294	\$14,055,866	n/a
UGI North**	\$8,295,323	\$8,843,538	n/a
Total/Industry Average*	\$103,265,182	\$105,047,318	\$164,036,569

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Dollars in Debt - Confirmed Low-Income Electric Customers - 2018-2020

Utility	2018 Total CLI Dollars in Debt	2019 Total CLI Dollars in Debt	2020 Total CLI Dollars in Debt
Duquesne	\$6,839,392	\$4,369,575	\$5,723,158
Met-Ed	\$11,968,646	\$12,541,083	\$24,026,543
PECO-Electric	\$5,454,863	\$5,907,018	\$7,835,523
Penelec	\$14,777,185	\$15,800,124	\$28,459,010
Penn Power	\$3,653,811	\$3,894,634	\$6,762,422
PPL	\$46,625,017	\$43,180,611	\$58,675,440
West Penn	\$11,664,300	\$14,317,307	\$28,856,451
Total/Industry Average	\$100,983,214	\$100,010,352	\$160,338,547

Dollars in Debt - Confirmed Low-Income Natural Gas Customers - 2018-2020

Utility	2018 Total CLI Dollars in Debt	2019 Total CLI Dollars in Debt	2020 Total CLI Dollars in Debt
Columbia	\$6,476,308	\$7,157,303	\$10,217,185
NFG	\$2,523,530	\$2,844,150	\$3,741,231
PECO-Gas	\$1,997,986	\$2,291,100	\$3,102,961
Peoples*	\$2,689,824	\$2,655,254	\$10,563,135
Peoples-Equitable*	\$1,709,082	\$1,734,569	n/a
PGW	\$11,209,481	\$8,589,766	\$6,530,000
UGI Utilities – Gas*	n/a	n/a	\$20,415,649
UGI South**	\$7,416,246	\$9,284,289	n/a
UGI North**	\$4,615,167	\$6,029,635	n/a
Total/Industry Average*	\$38,637,624	\$40,586,066	\$54,570,161

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percent of Total Dollars Owed - On an Arrangement Versus Not on an Arrangement

The **percent of total dollars owed** in the two reporting categories is calculated by dividing the total dollars owed in a category by the overall total dollars owed. Higher percentages of dollars not on an arrangement represent greater uncollectible risk.

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Percent of Dollars Owed on an Arrangement – Residential Electric Customers – 2020

Utility	Percent of Dollars Owed – On an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Duquesne	48.9%	51.1%
Met-Ed	57.6%	42.4%
PECO-Electric	23.6%	76.4%
Penelec	58.8%	41.2%
Penn Power	59.3%	40.7%
PPL	22.3%	77.7%
West Penn	58.6%	41.4%
Total/Industry Average	38.7%	61.3%

Percent of Dollars Owed on an Agreement – Residential Natural Gas Customers – 2020

Utility	Percent of Dollars Owed – On an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Columbia	64.0%	36.0%
NFG	13.2%	86.8%
PECO-Gas	27.7%	72.3%
Peoples*	52.6%	47.4%
PGW	7.7%	92.3%
UGI Utilities – Gas*	67.4%	32.6%
Total/Industry Average*	35.1%	64.9%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percent of Dollars Owed on an Arrangement – Confirmed Low-Income Electric Customers – 2020

Utility	Percent of Dollars Owed – on an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Duquesne	50.6%	49.4%
Met-Ed	59.7%	40.3%
PECO-Electric	36.5%	63.5%
Penelec	60.3%	39.7%
Penn Power	61.6%	38.4%
PPL	8.1%	91.9%
West Penn	60.4%	39.6%
Total/Industry Average	39.7%	60.3%

Percent of Dollars Owed on an Arrangement – Confirmed Low-Income Natural Gas Customers – 2020

Utility	Percent of Dollars Owed – on an Arrangement	Percent of Dollars Owed – Not on an Arrangement
Columbia	74.7%	25.3%
NFG	12.6%	87.4%
PECO-Gas	40.4%	59.6%
Peoples*	61.8%	38.2%
PGW	39.2%	60.8%
UGI Utilities – Gas*	95.3%	4.7%
Total/Industry Average	69.5%	30.5%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Average Arrearage

Average arrearage is calculated by dividing the total dollars in debt by the number of customers in debt. This shows the average arrearage (debt) carried by each customer with an overdue balance. Larger average arrearages may take more time for customers to pay off and pose more of an uncollectible risk than smaller average arrearages. The overall average arrearage amount is based on the total dollars and number of customers in debt and does not reflect an average of the two amounts in the table below.

Average Arrearage – Residential Electric Customers – 2020

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Duquesne	\$1,156.17	\$362.26	\$545.28
Met-Ed	\$1,034.37	\$451.31	\$668.38
PECO-Electric	\$772.98	\$437.03	\$487.06
Penelec	\$1,127.32	\$450.31	\$696.06
Penn Power	\$1,191.78	\$464.86	\$728.35
PPL	\$527.88	\$628.23	\$602.69
West Penn	\$1,158.20	\$442.19	\$693.47
Total/Industry Average	\$880.57	\$498.89	\$599.47

Average Arrearage – Residential Natural Gas Customers - 2020

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Columbia	\$868.67	\$470.66	\$666.06
NFG	\$60.28	\$351.84	\$214.80
PECO-Gas	\$919.80	\$618.74	\$680.41
Peoples*	\$897.44	\$289.67	\$449.90
PGW	\$529.17	\$701.42	\$684.25
UGI Utilities – Gas*	\$784.68	\$262.62	\$475.96
Total/Industry Average*	\$667.39	\$496.60	\$545.65

^{*}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

Average Arrearage – Confirmed Low-Income Electric Customers – 2020

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Duquesne	\$1,367.17	\$717.47	\$944.73
Met-Ed	\$1,117.88	\$599.41	\$828.73
PECO-Electric	\$1,006.73	\$1,243.98	\$1,145.54
Penelec	\$1,187.12	\$574.71	\$834.11
Penn Power	\$1,261.39	\$603.73	\$889.44
PPL	\$464.21	\$1,009.75	\$922.32
West Penn	\$1,252.76	\$609.10	\$883.30
Total/Industry Average	\$1,065.91	\$804.64	\$891.27

Average Arrearage - Confirmed Low-Income Natural Gas Customers - 2020

Utility	Average Arrearage on an Arrangement	Average Arrearage Not on an Arrangement	Overall Average Arrearage
Columbia	\$1,038.94	\$555.03	\$844.71
NFG	\$61.77	\$507.55	\$265.79
PECO-Gas	\$1,225.06	\$1,586.69	\$1,417.52
Peoples*	\$939.92	\$398.69	\$617.26
PGW	\$486.73	\$1,004.40	\$708.63
UGI Utilities – Gas*	\$810.28	\$514.34	\$789.10
Total/Industry Average*	\$725.81	\$588.70	\$677.38

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Average Arrearage – Residential Electric Customers – 2018-2020

Utility	2018 Average Arrearage	2019 Average Arrearage	2020 Average Arrearage
Duquesne	\$438.03	\$383.34	\$545.28
Met-Ed	\$440.02	\$449.05	\$668.38
PECO-Electric	\$272.23	\$305.63	\$487.06
Penelec	\$447.22	\$468.98	\$696.06
Penn Power	\$492.36	\$514.58	\$728.35
PPL	\$446.52	\$429.44	\$602.69
West Penn	\$406.93	\$443.50	\$693.47
Total/Industry Average	\$407.28	\$409.64	\$599.47

Average Arrearage – Residential Natural Gas Customers – 2018-2020

Utility	2018 Average Arrearage	2019 Average Arrearage	2020 Average Arrearage
Columbia	\$507.04	\$544.31	\$666.06
NFG	\$190.66	\$178.96	\$214.80
PECO-Gas	\$383.03	\$456.57	\$680.41
Peoples*	\$222.25	\$243.45	\$449.90
Peoples-Equitable*	\$192.00	\$214.82	n/a
PGW	\$492.83	\$508.45	\$684.25
UGI Utilities – Gas*	n/a	n/a	\$475.96
UGI South**	\$293.79	\$340.29	n/a
UGI North**	\$372.42	\$444.94	n/a
Total/Industry Average*	\$365.83	\$393.04	\$545.65

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Average Arrearage – Confirmed Low-Income Electric Customers – 2018-2020

Utility	2018 Average Arrearage	2019 Average Arrearage	2020 Average Arrearage
Duquesne	\$1,013.54	\$839.50	\$944.73
Met-Ed	\$535.22	\$550.82	\$828.73
PECO-Electric	\$537.64	\$711.17	\$1,145.54
Penelec	\$528.53	\$556.91	\$834.11
Penn Power	\$587.33	\$607.21	\$889.44
PPL	\$709.99	\$677.79	\$922.32
West Penn	\$506.07	\$558.27	\$883.30
Total/Industry Average	\$622.76	\$623.44	\$891.27

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Average Arrearage - Confirmed Low-Income Natural Gas Customers - 2018-2020

Utility	2018 Average Arrearage	2019 Average Arrearage	2020 Average Arrearage
Columbia	\$602.49	\$651.14	\$844.71
NFG	\$269.36	\$247.81	\$265.79
PECO-Gas	\$792.98	\$996.13	\$1,417.52
Peoples*	\$280.54	\$301.90	\$617.26
Peoples-Equitable*	\$243.81	\$271.66	n/a
PGW	\$566.02	\$568.14	\$708.63
UGI Utilities – Gas*	n/a	n/a	\$789.10
UGI South**	\$588.52	\$635.39	n/a
UGI North**	\$646.81	\$720.04	n/a
Total/Industry Average*	\$490.48	\$519.97	\$677.38

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Accounts Exceeding \$10,000 in Arrearages

On Dec. 22, 2014, Act 155 became effective, reauthorizing and amending Chapter 14 of the Public Utility Code (66 Pa. C.S. §§ 1401-1419), Responsible Utility Customer Protection. Act 155 implemented a new reporting requirement³³ for the public utilities to report data regarding the number of active (*i.e.* accounts not final billed) residential accounts that exceed \$10,000 in arrearages at the end of each calendar year, along with those account balances.³⁴ We present that data in the tables below, noting that PECO has reported electric and gas accounts together. Peoples and Peoples-Equitable have always reported combined data for this metric, even prior to their merger. The average arrearage is calculated by dividing the total arrearage (sum of all account balances over \$10,000) by the number of accounts.

Residential Total Number of Accounts Over \$10,000 - Electric Customers - 2018-2020

Utility	2018 Total Number of Accounts over 10k	2019 Total Number of Accounts over 10k	2020 Total Number of Accounts over 10k
Duquesne	46	25	99
Met-Ed	48	50	162
PECO-Electric/Gas	69	82	197
Penelec	75	86	224
Penn Power	22	25	57
PPL	181	209	440
West Penn	73	73	230
Total/Industry Average	514	550	1,409

³³ Final Order Chapter 14 Implementation Docket No. M-2014-2448824, order entered July 9, 2015. Section 1410.1(3) (Public utility duties) (Reporting Requirements re: Accounts Exceeding \$10,000 in Arrearages), pp 32-33.

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

³⁴ The utilities report several data points under Section 1410.1(3), however, only data relevant to the Universal Service Programs & Collections Performance has been included in this report. All public utility annual 1410.1(3) reports are available at Docket No. M-2014-2448824.

Residential Total Number of Accounts Over \$10,000 - Natural Gas Customers - 2018-2020

Utility	2018 Total Number of Accounts over 10k	2019 Total Number of Accounts over 10k	2020 Total Number of Accounts over 10k
Columbia	0	1	3
NFG	0	0	0
Peoples/Peoples-EQT*	5	5	14
PGW	200	139	219
UGI Utilities – Gas*	n/a	n/a	7
UGI South	1	1	n/a
UGI North	2	1	n/a
Total/Industry Average*	208	147	243

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Residential Total Arrearages of Accounts Over \$10,000 - Electric Customers - 2018-2020

Utility	2018 Total Arrearages of Accounts over 10k	2019 Total Arrearages of Accounts over 10k	2020 Total Arrearages of Accounts over 10k
Duquesne	\$632,535	\$342,529	\$1,367,612
Met-Ed	\$608,870	\$672,880	\$2,135,811
PECO-Electric/Gas	\$939,150	\$1,101,520	\$2,700,673
Penelec	\$1,037,115	\$1,271,323	\$3,118,889
Penn Power	\$298,263	\$353,735	\$763,622
PPL	\$2,555,841	\$3,057,044	\$6,202,758
West Penn	\$939,166	\$957,296	\$3,057,144
Total/Industry Average	\$7,010,940	\$7,756,327	\$19,346,509

Residential Total Arrearages of Accounts Over \$10,000 - Natural Gas Customers - 2018-2020

Utility	2018 Total Arrearages of Accounts over 10k	2019 Total Arrearages of Accounts over 10k	2020 Total Arrearages of Accounts over 10k
Columbia	\$0	\$13,845	\$39,675
NFG	\$0	\$0	\$0
Peoples/Peoples-EQT*	\$70,330	\$55,654	\$159,802
PGW	\$2,527,459	\$1,724,772	\$2,754,119
UGI Utilities – Gas*	n/a	n/a	\$93,189
UGI South	\$13,372	\$14,885	n/a
UGI North	\$29,189	\$17,278	n/a
Total/Industry Average*	\$2,640,351	\$1,826,433	\$3,046,785

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Residential Average Arrearage of Accounts Over \$10,000 - Electric Customers - 2018-2020

Utility	2018 Average Arrearage of Accounts over 10k	2019 Average Arrearage of Accounts over 10k	2020 Average Arrearage of Accounts over 10k
Duquesne	\$13,750.76	\$13,701.15	\$13,814.27
Met-Ed	\$12,684.80	\$13,457.59	\$13,184.02
PECO-Electric/Gas	\$13,610.87	\$13,433.17	\$13,709.00
Penelec	\$13,828.20	\$14,782.83	\$13,923.61
Penn Power	\$13,557.41	\$14,149.38	\$13,396.87
PPL	\$14,120.67	\$14,627.00	\$14,097.18
West Penn	\$12,865.29	\$13,113.65	\$13,291.93
Total/Industry Average	\$13,639.96	\$14,102.41	\$13,730.67

Residential Average Arrearage of Accounts Over \$10,000 - Natural Gas Customers - 2018-2020

Utility	2018 Average Arrearage of Accounts over 10k	2019 Average Arrearage of Accounts over 10k	2020 Average Arrearage of Accounts over 10k
Columbia	\$0.00	\$13,844.54	\$13,224.92
NFG	\$0.00	\$0.00	\$0.00
Peoples/Peoples-EQT*	\$14,066.04	\$11,130.76	\$11,414.44
PGW	\$12,637.29	\$12,408.43	\$12,575.88
UGI Utilities – Gas*	n/a	n/a	\$13,312.71
UGI South**	\$13,372.32	\$14,884.68	n/a
UGI North**	\$14,594.67	\$17,278.21	n/a
Total/Industry Average*	\$12,693.99	\$12,424.71	\$12,538.21

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Revenues (Billings)

Revenues (Billings) are the cumulative, year-end total dollars billed by the public utility for the previous year and reported in the USRR for both the residential and confirmed low-income categories. Billings are used in the calculation of other collection performance metrics, and include dollars collected from universal service program recipients, including CAP customers' billings.

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Residential Revenues (Billings) - Electric Customers - 2020

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Duquesne	\$590,711,570	\$62,549,278	10.6%
Met-Ed	\$609,398,255	\$92,996,158	15.3%
PECO-Electric	\$2,055,049,657	\$125,976,979	6.1%
Penelec	\$570,011,917	\$111,220,802	19.5%
Penn Power	\$187,558,506	\$25,422,264	13.6%
PPL	\$1,983,204,481	\$419,283,358	21.1%
West Penn	\$679,260,398	\$90,556,779	13.3%
Total/Industry Average	\$6,675,194,784	\$928,005,618	13.9%

Residential Revenues (Billings) - Natural Gas Customers - 2020

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Columbia	\$399,445,838	\$71,720,644	18.0%
NFG	\$130,691,047	\$17,284,671	13.2%
PECO-Gas	\$405,611,050	\$17,337,217	4.3%
Peoples*	\$472,741,659	\$42,546,749	9.0%
PGW	\$499,157,709	\$109,441,403	21.9%
UGI Utilities – Gas*	\$481,690,358	\$55,024,363	11.4%
Total/Industry Average*	\$2,389,337,661	\$313,355,047	13.1%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percent of Revenues (Billings) in Debt

The **percent of revenues (billings) in debt** is calculated by dividing the total annual revenues (billings) by the total monthly average dollars in debt. This calculated variable provides another way to measure the extent of customer debt. In the following two tables, the higher the percentage, the greater the potential collection risk.

Percent of Revenues (Billings) in Debt - Residential Electric Customers - 2018-2020

Utility	2018	2019	2020
Duquesne	3.4%	2.9%	4.7%
Met-Ed	3.2%	3.3%	5.7%
PECO-Electric	1.4%	1.5%	3.0%
Penelec	3.8%	4.2%	6.9%
Penn Power	3.0%	3.4%	5.2%
PPL	4.4%	4.2%	5.6%
West Penn	3.0%	3.5%	6.1%
Total/Industry Average	3.1%	3.1%	4.9%

Percent of Revenues (Billings) in Debt - Residential Natural Gas Customers - 2018-2020

Utility	2018	2019	2020
Columbia	3.1%	3.5%	4.3%
NFG	3.3%	3.7%	5.6%
PECO-Gas	2.4%	2.6%	5.9%
Peoples*	1.8%	2.0%	4.7%
Peoples-Equitable*	1.7%	1.9%	n/a
PGW	7.7%	7.4%	11.9%
UGI Utilities – Gas*	n/a	n/a	6.3%
UGI South**	5.2%	5.4%	n/a
UGI North**	5.1%	5.4%	n/a
Total/Industry Average*	4.0%	4.2%	6.7%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percent of Revenues (Billings) in Debt – Confirmed Low-Income Electric Customers – 2018-2020

Utility	2018	2019	2020
Duquesne	10.6%	7.1%	9.1%
Met-Ed	11.1%	11.8%	25.8%
PECO-Electric	3.6%	4.3%	6.2%
Penelec	11.4%	12.6%	25.6%
Penn Power	12.0%	13.6%	26.6%
PPL	12.3%	11.6%	14.0%
West Penn	11.3%	14.1%	31.9%
Total/Industry Average	10.4%	10.7%	17.3%

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Percent of Revenues (Billings) in Debt - Confirmed Low-Income Natural Gas Customers - 2018-2020

Utility	2018	2019	2020
Columbia	8.3%	9.1%	12.6%
NFG	11.4%	14.6%	21.6%
PECO-Gas	8.8%	9.7%	17.9%
Peoples*	3.3%	10.4%	24.8%
Peoples-Equitable*	4.1%	9.4%	n/a
PGW	8.1%	6.4%	6.0%
UGI Utilities – Gas*	n/a	n/a	37.1%
UGI South**	19.1%	24.8%	n/a
UGI North**	16.6%	20.3%	n/a
Total/Industry Average*	8.6%	11.0%	17.0%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Gross Residential Write-Offs in Dollars

The tables below represent the **gross residential write-offs in dollars** for EDCs and NGDCs. Write-offs are the last action on final-billed overdue accounts. A residential account is written off after all pre-write-off collection actions are taken and the customer fails to make payment on the balance owed. Generally, a public utility writes off accounts on either a monthly or annual basis. The gross write-offs figures do not include CAP credits or arrearage forgiveness.

Gross Write-Offs in Dollars – Electric Customers – 2020

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Duquesne	\$13,917,013	\$4,149,205	29.8%
Met-Ed	\$10,590,500	\$8,106,239	76.5%
PECO-Electric	\$16,965,528	\$4,082,863	24.1%
Penelec	\$11,281,446	\$8,992,717	79.7%
Penn Power	\$2,406,621	\$1,897,416	78.8%
PPL	\$32,110,096	\$17,018,351	53.0%
West Penn	\$11,035,112	\$8,341,292	75.6%
Total/Industry Average	\$98,306,316	\$52,588,083	53.5%

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Gross Write-Offs in Dollars – Natural Gas Customers – 2020

Utility	Residential	Confirmed Low-Income	Percent Confirmed Low-Income
Columbia	\$4,204,533	\$2,250,506	53.5%
NFG	\$4,079,349	\$2,653,618	65.1%
PECO-Gas	\$1,397,822	\$560,272	40.1%
Peoples*	\$11,997,515	\$3,839,205	32.0%
PGW	\$21,030,875	\$8,988,079	42.7%
UGI Utilities – Gas*	\$10,734,440	\$592,292	5.5%
Total/Industry Average*	\$53,444,534	\$18,883,972	35.3%

^{*}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

Gross Write-Offs in Dollars – Residential Electric Customers – 2018-2020

Utility	2018 Gross Write-Offs in Dollars	2019 Gross Write-Offs in Dollars	2020 Gross Write-Offs in Dollars
Duquesne	\$19,578,220	\$14,436,076	\$13,917,013
Met-Ed	\$15,183,890	\$14,939,366	\$10,590,500
PECO-Electric	\$27,660,902	\$28,461,191	\$16,965,528
Penelec	\$15,418,293	\$15,212,941	\$11,281,446
Penn Power	\$3,358,838	\$3,448,167	\$2,406,621
PPL	\$53,809,070	\$51,249,852	\$32,110,096
West Penn	\$15,506,690	\$16,109,498	\$11,035,112
Total/Industry Average	\$150,515,903	\$143,857,091	\$98,306,316

Gross Write-Offs in Dollars – Residential Natural Gas Customers – 2018-2020

Utility	2018 Gross Write-Offs in Dollars	2019 Gross Write-Offs in Dollars	2020 Gross Write-Offs in Dollars
Columbia	\$8,531,390	\$8,903,865	\$4,204,533
NFG	\$4,330,927	\$4,166,463	\$4,079,349
PECO-Gas	\$1,784,559	\$2,184,559	\$1,397,822
Peoples*	\$7,957,830	\$9,322,215	\$11,997,515
Peoples-Equitable*	\$5,143,394	\$6,626,698	n/a
PGW	\$34,986,533	\$32,545,577	\$21,030,875
UGI Utilities – Gas*	n/a	n/a	\$10,734,440
UGI South**	\$8,854,360	\$10,153,148	n/a
UGI North**	\$4,904,780	\$5,893,436	n/a
Total/Industry Average*	\$76,493,773	\$79,795,961	\$53,444,534

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Gross Write-Offs in Dollars - Confirmed Low-Income Electric Customers - 2018-2020

Utility	2018 Gross Write-Offs in Dollars CLI	2019 Gross Write-Offs in Dollars CLI	2020 Gross Write-Offs in Dollars CLI
Duquesne	\$6,837,415	\$3,849,895	\$4,149,205
Met-Ed	\$11,804,288	\$11,582,626	\$8,106,239
PECO-Electric	\$7,021,663	\$6,203,902	\$4,082,863
Penelec	\$12,456,688	\$12,405,094	\$8,992,717
Penn Power	\$2,721,776	\$2,754,306	\$1,897,416
PPL	\$39,280,621	\$37,274,682	\$17,018,351
West Penn	\$11,935,290	\$12,362,585	\$8,341,292
Total/Industry Average	\$92,057,741	\$86,433,090	\$52,588,083

Gross Write-Offs in Dollars - Confirmed Low-Income Natural Gas Customers - 2018-2020

Utility	2018 Gross Write-Offs in Dollars CLI	2019 Gross Write-Offs in Dollars CLI	2020 Gross Write-Offs in Dollars CLI
Columbia	\$4,937,124	\$4,440,413	\$2,250,506
NFG	\$2,960,771	\$3,335,504	\$2,653,618
PECO-Gas	\$290,818	\$677,475	\$560,272
Peoples*	\$2,069,036	\$2,423,776	\$3,839,205
Peoples-Equitable*	\$925,811	\$1,722,941	n/a
PGW	\$29,177,942	\$29,368,288	\$8,988,079
UGI Utilities – Gas*	n/a	n/a	\$592,292
UGI South**	\$5,046,985	\$5,787,294	n/a
UGI North**	\$3,040,964	\$3,653,930	n/a
Total/Industry Average*	\$48,449,451	\$51,409,621	\$18,883,972

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Gross Write-Offs Ratio

The percentage of residential billings written off as uncollectible is the most commonly used long-term measure of collection system performance and is called the **gross write-offs ratio**. This measure is calculated by dividing the annual total gross dollars written off for residential accounts by the annual total dollars of residential billings. The measure offers an equitable basis for comparison of gross residential dollars written off to the annual total dollars of residential billings. Figures used in the tables below do not include CAP credits or arrearage forgiveness.

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to system conversion issues.

Gross Write-Offs Ratio – Electric Customers – 2020

Utility	Residential Gross Write-Offs Ratio	Confirmed Low-Income Gross Write-Offs Ratio
Duquesne	2.4%	6.6%
Met-Ed	1.7%	8.7%
PECO-Electric	0.8%	3.2%
Penelec	2.0%	8.1%
Penn Power	1.3%	7.5%
PPL	1.6%	4.1%
West Penn	1.6%	9.2%
Total/Industry Average	1.5%	5.7%

Gross Write-Offs Ratio - Natural Gas Customers - 2020

Utility	Residential Gross Write-Offs Ratio	Confirmed Low-Income Gross Write-Offs Ratio
Columbia	1.1%	3.1%
NFG	3.1%	15.4%
PECO-Gas	0.3%	3.2%
Peoples*	2.5%	9.0%
PGW	4.2%	8.2%
UGI Utilities – Gas*	2.2%	1.1%
Total/Industry Average*	2.2%	6.0%

^{*}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

Gross Write-Offs Ratio - Residential Electric Customers - 2018-2020

Utility	2018 Gross Write-Offs Ratio	2019 Gross Write-Offs Ratio	2020 Gross Write-Offs Ratio
Duquesne	3.5%	2.6%	2.4%
Met-Ed	2.4%	2.4%	1.7%
PECO-Electric	1.4%	1.4%	0.8%
Penelec	2.6%	2.7%	2.0%
Penn Power	1.7%	1.9%	1.3%
PPL	2.6%	2.6%	1.6%
West Penn	2.2%	2.3%	1.6%
Total/Industry Average	2.2%	2.2%	1.5%

Gross Write-Offs Ratio - Residential Natural Gas Customers - 2018-2020

Utility	2018 Gross Write-Offs Ratio	2019 Gross Write-Offs Ratio	2020 Gross Write-Offs Ratio
Columbia	1.9%	2.1%	1.1%
NFG	2.8%	2.9%	3.1%
PECO-Gas	0.4%	0.5%	0.3%
Peoples*	2.5%	3.1%	2.5%
Peoples-Equitable*	2.2%	3.1%	n/a
PGW	6.4%	6.1%	4.2%
UGI Utilities – Gas*	n/a	n/a	2.2%
UGI South**	3.3%	3.9%	n/a
UGI North**	3.0%	3.6%	n/a
Total/Industry Average*	3.0%	3.2%	2.2%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Annual Collection Operating Expenses

Annual collection operating expenses include administrative expenses associated with termination activity, negotiating payment arrangements, budget counseling, investigation and resolution of informal and formal complaints associated with payment arrangements, securing and maintaining deposits, tracking delinquent accounts, collection agencies' expenses, litigation expenses other than Commission-related, dunning expenses, and winter survey expenses. Dunning, in the business context, refers to the collections process, whereby a business communicates with customers who have fallen behind in paying their bills. CAP recipient collection expenses are excluded. Due, in part, to the Commission's COVID-19 pandemic termination moratorium and protections, utilities reported less annual collection operating expenses in 2020.

The tables below include both the residential and confirmed low-income categories to allow for the presentation of the percent of annual collection operating expenses which are attributed to confirmed low-income. Confirmed low-income dollar amounts are based on utility-specific allocation factors (percentages) of the total operating expenses.

^{**}UGI South and UGI North performed limited credit and collection activities for most of 2017 through early 2019 due to a system conversion, issues.

Annual Electric Collection Operating Expenses – 2020

Utility	Residential	Confirmed Low-Income	Percent of Collection Operating Expenses for Confirmed Low- Income Customers
Duquesne*	\$5,047,179	n/a	n/a
Met-Ed	\$12,916,942	\$9,403,191	72.8%
PECO-Electric	\$11,371,263	\$1,110,220	9.8%
Penelec	\$13,276,426	\$10,200,878	76.8%
Penn Power	\$3,137,598	\$2,316,253	73.8%
PPL	\$9,860,638	\$5,226,138	53.0%
West Penn	\$12,947,688	\$9,383,596	72.5%
Total/Industry Average	\$68,557,734	\$42,687,455	62.3%

^{*}Duquesne reports it does not differentiate between confirmed low-income and residential operating expenses. The Industry Total and Average for Percent of Collection Operating Expenses for Confirmed Low-Income does not include Duquesne.

Annual Natural Gas Collection Operating Expenses - 2020

Utility	Residential	Confirmed Low-Income	Percent of Collection Operating Expenses for Confirmed Low- Income Customers
Columbia	\$2,000,716	\$616,043	30.8%
NFG	\$488,958	\$189,875	38.8%
PECO-Gas	\$1,405,437	\$78,357	5.6%
Peoples*	\$3,240,421	\$602,718	18.6%
PGW	\$957,865	\$263,173	27.5%
UGI Utilities – Gas*	\$4,599,633	\$2,212,408	48.1%
Total/Industry Average*	\$12,693,030	\$3,962,574	31.2%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

3. Universal Service Programs

Demographics

The USRR requires EDCs and NGDCs to report the demographics of universal service program recipients, including the number of household members under age 18 and over age 62, household size, income, and source of income. A low-income customer is defined³⁵ as a residential public utility customer whose household income is at or below 150% of FPIG. Appendix 3 shows poverty levels in relation to household size and income. The following tables present some of the demographic information for low-income customers who participate in the universal service programs during 2020.

Average Household Income and Size

For all 2020 participants in universal service programs, average annual household income for electric customers was \$15,618 and \$13,914 for natural gas customers. The average annual household income is an approximation based on an average of the averages for each utility.

Participants in Universal Service Programs

Average Household Income – Summary for All Electric Customers – 2018-2020

Program	2018	2019	2020
LIURP	\$16,419	\$17,947	\$18,204
CAP	\$14,291	\$14,387	\$14,292
CARES	\$17,109	\$13,438	\$18,572
Hardship Fund	\$21,156	\$22,202	\$22,018
Total/Industry Average	\$14,800	\$14,594	\$15,618

Participants in Universal Service Programs

Average Household Income – Summary for All Natural Gas Customers – 2018-2020

Program	2018	2019	2020
LIURP	\$15,070	\$15,660	\$16,060
CAP	\$14,509	\$13,300	\$12,223
CARES	\$14,815	\$14,318	\$14,791
Hardship Fund	\$12,972	\$14,585	\$12,581
Total/Industry Average	\$14,342	\$14,462	\$13,914

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³⁵ 52 Pa. Code § 54.72 and § 62.2

Source of Income

The majority of electric and natural gas customers participating in universal service programs have incomes from employment or pension/retirement benefits. The Other category includes all other income types, such as self-employed, seasonal, dependent, alimony, child support, no income, and missing data. Unemployment compensation increases among CAP and hardship fund recipients in 2020 may be due to the financial impact of the COVID-19 pandemic.

Participants in Universal Service Programs

Source of Household Income – Summary for All LIURP Electric Customers – 2018-2020

Source of Household Income	2018 LIURP	2019 LIURP	2020 LIURP
Employment	32.3%	32.1%	38.8%
Pension or Retirement	21.0%	23.3%	17.5%
Unemployment Compensation	13.7%	17.9%	11.4%
Disability	12.4%	11.1%	15.7%
Public Assistance	2.7%	2.6%	2.0%
Other	18.0%	13.0%	14.4%

Participants in Universal Service Programs Source of Household Income – Summary for All CAP Electric Customers – 2018-2020

Source of Household Income	2018 CAP	2019 CAP	2020 CAP
Employment	29.0%	28.8%	27.1%
Pension or Retirement	20.2%	21.7%	21.5%
Unemployment Compensation	2.3%	2.1%	4.6%
Disability	25.2%	21.9%	21.5%
Public Assistance	3.2%	3.1%	2.7%
Other	20.2%	22.4%	22.6%

Participants in Universal Service Programs Source of Household Income – Summary for All Hardship Fund Electric Customers – 2018-2020

Source of Household Income	2018 Hardship Fund	2019 Hardship Fund	2020 Hardship Fund
Employment	47.1%	46.8%	47.3%
Pension or Retirement	18.3%	10.9%	17.0%
Unemployment Compensation	2.9%	2.3%	9.7%
Disability	14.1%	15.4%	13.8%
Public Assistance	3.7%	2.6%	0.7%
Other	13.9%	22.1%	11.6%

Participants in Universal Service Programs Source of Household Income — Summary for All LIURP Natural Gas Customers — 2018-2020

Source of Household Income	2018 LIURP	2019 LIURP	2020 LIURP
Employment	27.8%	26.0%	27.6%
Pension or Retirement	29.7%	30.0%	29.2%
Unemployment Compensation	9.7%	7.4%	5.9%
Disability	15.9%	13.5%	14.3%
Public Assistance	3.3%	2.7%	3.2%
Other	13.6%	20.4%	19.8%

Participants in Universal Service Programs Source of Household Income - Summary for All CAP Natural Gas Customers - 2018-2020

Source of Household Income	2018 CAP	2019 CAP	2020 CAP
Employment	30.5%	30.2%	27.6%
Pension or Retirement	31.8%	33.1%	32.6%
Unemployment Compensation	2.2%	2.1%	4.6%
Disability	18.5%	17.1%	17.7%
Public Assistance	3.8%	3.6%	3.4%
Other	13.2%	13.9%	14.0%

Participants in Universal Service Programs Source of Household Income – Summary for All Hardship Fund Natural Gas Customers – 2018-2020

Source of Household Income	2018 Hardship Fund	2019 Hardship Fund	2020 Hardship Fund
Employment	41.0%	43.2%	39.1%
Pension or Retirement	18.6%	19.2%	16.4%
Unemployment Compensation	2.5%	2.7%	5.6%
Disability	17.1%	16.6%	18.8%
Public Assistance	2.5%	3.6%	1.9%
Other	18.4%	14.7%	18.2%

Universal Service Participant Income Compared to the Federal Poverty Income Guidelines

Demographic data from the USRR reporting shows that "working poor" households in Pennsylvania do not always have incomes that exceed 150% of FPIG. According to the U.S. Bureau of Labor Statistics, the definition of a "working poor" household begins with a wage-earner who works full time (35+ hrs/week) at a minimum-wage job. In

2020, minimum wage in Pennsylvania was \$7.25 per hour, the same as it has been since 2009.³⁶ Annual income for an individual wage earner who works at a full time (40hr/week) minimum-wage job is \$15,080, which equates to 118% of FPIG in 2020 and 117% FPIG in 2021. By comparison, the average electric CAP household (two persons) had an income of \$14,292 in 2020, which placed these households' incomes at approximately 83% of FPIG (for two persons) for 2020, and 82% for 2021. The average natural gas CAP household (two persons) had an income of \$12,223, which placed the household at approximately 71% of FPIG for 2020, and 70% for 2021. See Appendix 3.

Low-Income Usage Reduction Program (LIURP)

LIURP is a statewide, public utility-sponsored, residential usage-reduction program mandated by the PUC.³⁷ The primary goal of LIURP is to assist low-income residential customers to reduce energy bills through usage reduction (energy conservation) and, as a result, to make bills more affordable.

LIURP is targeted toward customers with annual incomes at or below 150% of FPIG. However, EDCs and NGDCs are permitted to spend up to 20% of their annual LIURP budgets on customers with incomes between 151% and 200% of FPIG. LIURP places priority on the highest energy users who offer the greatest opportunities for energy savings and bill reductions. When feasible, the program targets customers with payment problems (arrearages). The program is available to both homeowners and renters. LIURP services all housing types, including single family homes, mobile homes, and multi-family residences.

The LIURP funds are often included in public utility rates as part of the distribution cost passed on to all residential customers or as part of a separate Universal Service rider, which the utility is able to recover. The LIURP funding levels, which are often modified in rate case proceedings, are reviewed as part of the public utility's most recently filed universal service and energy conservation plans (USECP). The utilities currently file USECPs approximately every five years, ³⁸ and the plans are reviewed by BCS. The public utility is required to develop a LIURP funding level based upon a needs assessment, ³⁹ which, in turn, is based on census and public utility data.

The PUC has regulatory oversight of LIURP, and the utilities may administer the program using both non-profit and for-profit contractors. The various program costs and installed usage reduction measures are agreed to in contracts between the contractors and the utilities.

Program measures are installed on a simple payback recovery basis of seven years or less for most program measures. Some exceptions must meet a 12-year simple payback recovery. The exceptions include sidewall insulation, attic insulation, furnace replacement, water heater replacement and refrigerator replacement. Recovery is the time it takes to recover the cost of the installed program measure through projected energy savings. Examples of the program measures include: air infiltration sealing using the blower door air sealing techniques, all types of insulation such as attic and sidewall, heating system treatments and replacements, water heating tank and pipe wraps, water heater replacements, faucet aerators, light-emitting diode (LED) lighting, refrigerator replacement, incidental repairs (not home rehabilitation), health and safety measures such as smoke and carbon monoxide detectors, and energy conservation education.

The factors impacting LIURP energy savings are: the level of pre-weatherization usage, occupant energy behavior, housing type and size, age of the dwelling, condition of the dwelling, end uses such as heating, cooling, and water heating, and contractor capabilities.

³⁶ The Pennsylvania state minimum wage of \$7.25 per hour was enacted on Jul. 24, 2009. https://www.dol.gov/agencies/whd/minimum-wage/state#pa

³⁷ 52 Pa. Code, Chapter 58

³⁸ On Oct. 3, 2019, at Docket No. M-2019-3012601, the Commission approved a pilot USECP filing schedule that supersedes the existing filing schedule and extends the duration of USECPs from three (3) years to five (5) years.

³⁹ 52 Pa. Code, § 58.4(c)(1-4)

LIURP benefits include: energy savings, bill reduction, improved health, safety and comfort levels, arrearage reduction, reduced collection activity, improved bill payment behavior, reduced use of supplemental fuels and secondary heating devices, more affordable low-income housing, reduction in homelessness, and less housing abandonment.

The USRR provisions require EDCs and NGDCs to report various LIURP data, including: annual program costs for the reporting year, number of family members under 18 years of age, number of family members over 62 years of age, family size, household income, source of income, participation levels for the reporting year, projected annual spending for the current year, projected annual participation levels for the current year, and average job costs.

In addition, this report also includes aggregate data on completed LIURP jobs provided by EDCs and NGDCs.

NOTE: Due to the COVID-19 pandemic, EDCs and NGDCs suspended LIURP production and spending for several months in 2020. The length of the suspension varied by utility.

LIURP Spending

EDCs and NGDCs that are unable to spend projected LIURP funds during one program year may carry over the unspent funds to the next year. Projected spending numbers noted below are reported to the Commission annually, but are estimates based on LIURP budgets approved in USECPs, or modified in base rate proceedings. 2020 saw a significant decrease in spending because EDCs and NGDCs were unable to gain access to many residences for months due to the COVID-19 pandemic.

LIURP Spending – Electric Utilities – 2020

Utility	2020 Projected Spending*	2020 Actual Spending	2021 Projected Spending*
Duquesne	\$3,053,500	\$1,566,479	\$2,409,000
Met-Ed	\$5,442,000	\$5,243,891	\$5,949,109
PECO-Electric	\$5,600,000	\$3,350,847	\$7,867,154**
Penelec	\$6,126,000	\$4,571,159	\$8,014,841
Penn Power	\$3,643,161	\$2,320,305	\$4,460,856
PPL	\$10,000,000	\$3,801,138	\$16,198,862
West Penn	\$6,426,697	\$5,420,587	\$7,322,110
Total/Industry Average	\$40,291,358	\$26,274,406	\$52,221,932

^{*}May include carryover of unspent funds from previous program year, special provisions, and settlements from rate cases.

LIURP Spending - Natural Gas Utilities - 2020

Utility	2020 Projected Spending*	2020 Actual Spending	2021 Projected Spending*
Columbia	\$4,955,929	\$2,510,577	\$7,320,352
NFG	\$2,129,300	\$820,235	\$2,609,065
PECO-Gas**	\$2,250,000	\$889,931	\$3,610,069
Peoples***	\$2,594,097	\$2,095,714	\$3,898,383
PGW	\$7,988,818	\$6,790,185	\$9,207,801
UGI Utilities – Gas***	\$3,830,609	\$1,788,743	\$5,697,504
Total/Industry Average***	\$23,748,753	\$14,895,385	\$32,343,174

^{*}May include carryover of unspent funds from previous program year, special provisions, and settlements from rate cases.

LIURP Production

LIURP production levels are influenced by many factors including: the size of the public utility's LIURP program budget; the heating saturation among the public utility's customer population; housing-stock characteristics such as the type, size, and condition; contractor capability; contractor capacity; and to a lesser extent, customer demographics, customer behavior and issues obtaining landlord permission for customers who rent. 2020 saw a significant decrease to the number of LIURP jobs completed because EDCs and NGDCs were unable to gain access to many residences for months due to the COVID-19 pandemic.

All LIURP gas jobs are classified as heating. For electric jobs, the determination of the job type depends on whether the customer heats primarily with electricity. If most of the dollars spent on the completed job are on heating-related program measures, then the job is classified as a heating job. If the customer does not heat with electricity but uses electricity for water heating, and most of the dollars spent on the completed job are on water-heating measures, then the job is classified as a water-heating job. If the customer does not use electricity for either heating or water heating, the completed job is automatically classified as a baseload job.

^{***}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

LIURP Electric Production - 2019-2021

	2019 Actual Production		2020 Actual Production		2021 Projected Production				
Utility	Heating Jobs	Water Heating Jobs	Baseload Jobs	Heating Jobs	Water Heating Jobs	Baseload Jobs	Heating Jobs	Water Heating Jobs	Baseload Jobs
Duquesne	59	7	659	216	9	1,415	310	10	2,780
Met-Ed	596	510	402	444	392	274	630	516	404
PECO-Electric	792	0	6,087	373	0	2,610	839	0	4,874
Penelec	481	1,236	661	261	727	337	464	1,188	678
Penn Power	213	285	377	142	187	242	219	289	357
PPL	1,556	822	1,101	506	412	682	2,400	1,400	1,900
West Penn	367	562	228	305	462	229	344	539	212
Total/Industry Average	4,064	3,422	9,515	2,247	2,189	5,789	5,206	3,942	11,205

LIURP Natural Gas Production - 2019-2021

Utility	2019 Actual Production Heating Jobs	2020 Actual Production Heating Jobs	2021 Projected Production Heating Jobs
Columbia	497	257	749
NFG	123	77	291
PECO-Gas	970	293	860
Peoples*	79	204	453
Peoples-Equitable*	74	n/a	n/a
PGW	3,010	1,657	2,213
UGI Utilities – Gas*	n/a	247	737
UGI South	166	n/a	n/a
UGI North	164	n/a	n/a
Total/Industry Average*	5,079	2,735	5,303

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

LIURP Average Job Costs

Customer usage profiles are typically highest for heating jobs followed by water heating jobs and baseload jobs. Average job costs are based on the total number of completed jobs in the job-type category and the total costs associated with those jobs. Specifically, the average job cost is calculated by dividing the total dollars spent on a type of job by the number of jobs completed.

LIURP Electric Average Heating Job Costs – 2018-2020

Utility	2018 Heating Jobs	2019 Heating Jobs	2020 Heating Jobs
Duquesne	\$6,275	\$4,090	\$1,400
Met-Ed	\$2,968	\$4,206	\$4,224
PECO-Electric	\$1,970	\$2,121	\$3,739
Penelec	\$3,392	\$3,528	\$4,021
Penn Power	\$3,349	\$4,137	\$6,716
PPL	\$3,860	\$4,342	\$4,461
West Penn	\$3,543	\$4,779	\$5,095

LIURP Electric Average Water Heating Job Costs - 2018-2020

Utility	2018 Water Heating Jobs	2019 Water Heating Jobs	2020 Water Heating Jobs		
Duquesne	\$1,962	\$1,666	\$3,824		
Met-Ed	\$1,921	\$2,713	\$2,747		
PECO-Electric	\$0	\$0	\$0		
Penelec	\$1,776	\$2,153	\$2,409		
Penn Power	\$1,931	\$1,925	\$2,215		
PPL	\$1,815	\$1,954	\$1,618		
West Penn	\$2,906	\$3,029	\$4,021		

LIURP Electric Average Baseload Job Costs - 2018-2020

Utility	2018 Baseload Jobs	2019 Baseload Jobs	2020 Baseload Jobs
Duquesne	\$459	\$561	\$869
Met-Ed	\$1,730	\$2,199	\$2,523
PECO-Electric	\$615	\$545	\$750
Penelec	\$1,504	\$1,563	\$1,990
Penn Power	\$1,436	\$1,442	\$1,823
PPL	\$1,052	\$1,143	\$1,036
West Penn	\$2,217	\$2,337	\$3,207

LIURP Natural Gas Average Job Cost - 2018-2020

Utility	2018 Heating Jobs	2019 Heating Jobs	2020 Heating Jobs
Columbia	\$8,172	\$8,138	\$7,207
NFG	\$5,208	\$5,741	\$5,624
PECO-Gas	\$1,718	\$2,303	\$3,037
Peoples*	\$6,301	\$8,216	\$8,174
Peoples-Equitable*	\$6,486	\$8,605	n/a
PGW	\$2,327	\$1,952	\$3,039
UGI Utilities – Gas*	n/a	n/a	\$6,440
UGI South	\$6,203	\$6,593	n/a
UGI North	\$5,512	\$5,746	n/a

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

LIURP Energy Savings and Bill Reduction

LIURP energy savings are determined by calculating the difference in a customer's usage during the 12 months following the installation of the LIURP measures (post period), from the usage during the 12 preceding months (pre period). The energy savings reported are based on weather-normalized data and represent an average of the public utility results for each job category. LIURP reporting results for the program year always trail two years behind the USRR reporting year due to the process of evaluating post-installation usage for 12 months, with analysis performed in the following year.

The estimated annual bill reduction is calculated by multiplying the average number of kWhs or Mcfs saved during the post-treatment period by the average price per kWh or Mcf during that period. EDCs and NGDCs voluntarily report pricing information annually. The 2016-2018 program year estimated annual bill reductions presented below are based on the average of the public utility results from each category of LIURP jobs completed in the program year, evaluated in following year (post period), and reported in the year after that. Example: 2018 program year was evaluated in 2019 (post period) and reported to the Commission in 2020.

A number of factors can effect energy savings and annual bill reduction estimates: unusually warm or cold weather during the LIURP program year (during the pre or post-period), condition of the housing stock, customer behavior and differences from year-to-year in the utilities' contractor performance and utility rates.

LIURP Energy Savings - 2016-2018 Program Years

Job Type	2016 Energy Savings	2017 Energy Savings	2018 Energy Savings		
Electric Heating	9.3%	8.0%	8.1%		
Electric Water Heating	11.1%	7.3%	6.6%		
Electric Baseload	7.7%	5.8%	5.6%		
Gas Heating	13.1%	16.3%	16.6%		

LIURP Estimated Annual Bill Reductions - 2016-2018 Program Years

Job Type	2016 Estimated Annual Bill Reduction	2017 Estimated Annual Bill Reduction	2018 Estimated Annual Bill Reduction		
Electric Heating	\$212	\$222	\$198		
Electric Water Heating	\$206	\$139	\$122		
Electric Baseload	\$119	\$92	\$84		
Gas Heating	\$211	\$324	\$304		

Customer Assistance Programs (CAPs)

The PUC monitors implementation of the Commission's statute, regulations and CAP Policy Statement⁴⁰ by EDCs serving more than 60,000 customers and NGDCs serving more than 100,000 customers. The USRR requires EDCs and NGDCs to report the number of customers enrolled in CAP. The Commission uses the number of participants enrolled in CAP at the end of the program year to quantify participation. Each qualifying EDC and NGDC submits a USECP for Commission approval and a third-party evaluation of its universal service programs. USECPs and Evaluations are posted on the Commission's website (Appendix 4 contains viewing instructions).

CAP Participation Rate

The **CAP participation rate** is defined as the number of participants enrolled as of Dec. 31, 2020, divided by the number of confirmed low-income customers served by the EDC or NGDC. The Commission expects EDCs and NGDCs to maintain open enrollment to meet the need in each utility's service territory. The CAP participation rate would be much lower if the rate reflected estimated low-income customers rather than confirmed low-income customers, as estimated customer numbers based on census data are much higher and less accurate. Due to the COVID-19 pandemic, most EDCs and NGDCs suspended CAP recertification requirements from March 2020 into 2021. This resulted in fewer customers removed from the program which in turn contributed to higher CAP participation rates in 2020.

CAP Participation – Electric Utilities – 2018-2020

	201	18	20:	19	2020		
Utility	Participants Enrolled as of 12/31/18	CAP Participant Rate	Participants Enrolled as of 12/31/19	Enrolled Participant		CAP Participant Rate	
Duquesne	36,075	73.1%	35,853	74.1%	33,638	70.6%	
Met-Ed	14,927	20.7%	13,043	17.7%	19,310	26.4%	
PECO-Electric	117,162	80.2%	111,124	79.6%	114,735	84.6%	
Penelec	20,902	23.1%	18,287	20.0%	25,345	28.1%	
Penn Power	4,619	23.0%	3,976	19.7%	5,546	27.9%	
PPL	56,539	29.8%	63,306	33.4%	65,862	34.0%	
West Penn	19,178	26.5%	15,692	21.2%	22,591	30.0%	
Total/Industry Average	269,402	42.1%	261,281	41.0%	287,027	45.2%	

⁴⁰ 66 Pa. C.S. §§ 2802(10), 2804(9), 2203(7) and 2203(8). 52 Pa. Code §§ 54.71-54.78, 62.1-62.8, and 69.261–69.267.

CAP Participation – Natural Gas Utilities – 2018-2020

	201	18	201	19	2020		
Utility	Participants Enrolled as of 12/31/18	CAP Participant Rate	Participants Enrolled as of 12/31/19	CAP Participant Rate	Participants Enrolled as of 12/31/20	CAP Participant Rate	
Columbia	23,600	34.9%	22,707	33.6%	23,542	34.6%	
NFG *	7,728	25.2%	7,392	22.9%	7,793	22.1%	
PECO-Gas	20,310	79.0%	19,358	77.5%	20,188	77.0%	
Peoples**	17,425	28.9%	15,969	23.6%	31,202	28.7%	
Peoples-Equitable**	13,194	29.5%	12,214	29.4%	n/a	n/a	
PGW	51,371	34.4%	54,040	36.8%	55,497	41.5%	
UGI Utilities – Gas**	n/a	n/a	n/a	n/a	24,236	31.3%	
UGI South	8,975	25.8%	11,265	28.8%	n/a	n/a	
UGI North	5,744	26.2%	7,613	30.5%	n/a	n/a	
Total/Industry Average**	148,347	34.1%	150,558	33.8%	162,458	36.1%	

^{*}NFG submitted corrected 2018 and 2019 CLI customer counts, which impact its CAP Participation Rate. The previous CLI customer counts did not include customers enrolled in CAP.

Monthly Average Electric CAP Participation – 2018-2020

Utility	2018	2019	2020
Duquesne	35,173	36,418	35,853
Met-Ed	15,201	13,993	16,186
PECO-Electric	116,325	112,157	113,536
Penelec	21,210	19,435	21,635
Penn Power	4,640	4,217	4,750
PPL	54,978	61,202	63,336
West Penn	22,150	17,232	19,090
Total/Industry Average	269,677	264,654	274,385

^{**}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

Monthly Average Natural Gas CAP Participation – 2018-2020

Utility	2018	2019	2020
Columbia	24,209	23,551	23,279
NFG	8,238	7,294	7,660
PECO-Gas	20,238	19,427	19,908
Peoples*	17,445	17,034	28,892
Peoples-Equitable*	13,251	12,928	n/a
PGW	49,034	53,722	54,646
UGI Utilities – Gas*	n/a	n/a	23,860
UGI South	7,576	8,422	n/a
UGI North	4,830	5,369	n/a
Total/Industry Average*	144,821	147,747	158,243

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Monthly Average Electric CAP Participation by Poverty Level – 2018-2020

	2018			2019			2020		
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Duquesne	7,016	17,485	10,673	7,646	18,093	10,680	7,360	17,778	10,715
Met-Ed	3,445	6,881	4,875	3,186	6,224	4,584	4,460	6,884	4,842
PECO-Electric	25,951	57,045	33,329	25,109	55,465	31,582	26,561	55,091	31,884
Penelec	3,836	10,340	7,035	3,400	9,420	6,615	4,559	10,216	6,860
Penn Power	842	2,180	1,618	731	1,991	1,495	1,022	2,134	1,594
PPL	9,440	25,980	19,558	12,010	27,689	21,504	12,418	27,890	23,028
West Penn	4,325	10,390	7,434	3,488	7,964	5,779	4,596	8,590	5,904
Total/Industry Average	54,855	130,301	84,522	55,570	126,845	82,239	60,976	128,583	84,826

Monthly Average Natural Gas CAP Participation by Poverty Level – 2018-2020

		2018			2019			2020		
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%-150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	
Columbia	5,426	10,772	8,012	5,297	10,539	7,715	5,397	10,385	7,497	
NFG	1,022	4,181	3,035	832	3,684	2,778	958	3,850	2,852	
PECO-Gas	4,755	8,564	6,919	4,542	8,288	6,597	4,837	8,434	6,637	
Peoples*	3,838	7,934	5,673	3,869	7,661	5,505	7,704	12,684	8,504	
Peoples- Equitable*	3,615	6,144	3,492	3,569	5,859	3,501	n/a	n/a	n/a	
PGW	14,469	27,579	6,986	12,936	35,651	5,135	11,879	29,735	13,031	
UGI Utilities – Gas*	n/a	n/a	n/a	n/a	n/a	n/a	6,293	11,366	6,201	
UGI South	2,314	3,680	1,582	2,493	4,004	1,925	n/a	n/a	n/a	
UGI North	1,132	2,352	1,346	1,260	2,531	1,577	n/a	n/a	n/a	
Total/Industry Average*	36,571	71,206	37,045	34,798	78,217	34,733	37,068	76,454	44,722	

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Monthly Average Percent Electric CAP Participation by Poverty Level – 2018-2020

	2018		2019			2020			
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Duquesne	19.9%	49.7%	30.3%	21.0%	49.7%	29.3%	20.5%	49.6%	29.9%
Met-Ed	22.7%	45.3%	32.1%	22.8%	44.5%	32.8%	27.6%	42.5%	29.9%
PECO-Electric	22.3%	49.0%	28.7%	22.4%	49.5%	28.2%	23.4%	48.5%	28.1%
Penelec	18.1%	48.7%	33.2%	17.5%	48.5%	34.0%	21.1%	47.2%	31.7%
Penn Power	18.1%	47.0%	34.9%	17.3%	47.2%	35.5%	21.5%	44.9%	33.6%
PPL	17.2%	47.3%	35.6%	19.6%	45.2%	35.1%	17.0%	45.5%	37.5%
West Penn	19.5%	46.9%	33.6%	20.2%	46.2%	33.5%	24.1%	45.0%	30.9%
Total/Industry Average	20.3%	48.3%	31.3%	21.0%	47.9%	31.1%	21.7%	47.2%	31.1%

Monthly Average Percent Natural Gas CAP Participation by Poverty Level - 2018-2020

		2018			2019			2020	
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Columbia	22.4%	44.5%	33.1%	22.5%	44.7%	32.8%	23.2%	44.6%	32.2%
NFG	12.4%	50.8%	36.8%	11.4%	50.5%	38.1%	12.5%	50.3%	37.2%
PECO-Gas	23.5%	42.3%	34.2%	23.4%	42.7%	34.0%	24.3%	42.4%	33.3%
Peoples*	22.0%	45.5%	32.5%	22.7%	45.0%	32.3%	26.7%	43.9%	29.4%
Peoples- Equitable*	27.3%	46.4%	26.4%	27.6%	45.3%	27.1%	n/a	n/a	n/a
PGW	29.5%	56.2%	14.2%	24.1%	66.4%	9.6%	21.7%	54.4%	23.8%
UGI Utilities – Gas*	n/a	n/a	n/a	n/a	n/a	n/a	26.4%	47.6%	26.0%
UGI South	30.5%	48.6%	20.9%	29.6%	47.5%	22.9%	n/a	n/a	n/a
UGI North	23.4%	48.7%	27.9%	23.5%	47.1%	29.4%	n/a	n/a	n/a
Total/Industry Average*	25.3%	49.2%	25.6%	23.6%	52.9%	23.5%	23.4%	48.3%	28.3%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

CAP Default Rate

The **CAP default rate** is calculated by dividing the average monthly CAP participation at each poverty level, by the total annual number of defaults for each poverty level. CAP customers are considered non-compliant (in default) when they fail to meet program requirements. Actions resulting in CAP defaults include missing payments, making late payments, or failing to recertify. CAP customers who voluntarily leave the program are not counted in the default rate. EDCs and NGDCs may track CAP default occurences differently. Therefore, the default rates in the tables below are not statisticly-valid for comparison purposes.

NOTE: Most EDCs and NGDCs suspended recertification requirements for CAP customers from March 2020 into 2021 due to the COVID-19 pandemic.⁴¹ This contributed to reduced CAP default rates in 2020.

⁴¹ Only Duquesne reported removing customers from CAP for failing to recertify after March 2020. Duquesne resumed its CAP recertification procedures and requirements on June 18, 2020.

Annual Electric CAP Default Rate by Poverty Level - 2018-2020

	2018		2019			2020			
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Duquesne	25.2%	16.9%	17.8%	27.2%	16.9%	16.8%	28.8%	20.2%	18.0%
Met-Ed	58.6%	35.1%	40.1%	72.4%	46.1%	51.7%	5.3%	7.7%	12.3%
PECO-Electric	30.2%	20.0%	55.3%	30.8%	20.3%	26.9%	13.8%	8.7%	11.5%
Penelec	62.6%	31.0%	35.1%	73.4%	39.7%	45.5%	4.1%	3.9%	7.9%
Penn Power	65.4%	34.7%	40.0%	79.8%	44.6%	48.0%	5.2%	4.8%	8.3%
PPL	26.2%	18.2%	17.1%	21.7%	12.9%	12.0%	11.4%	9.0%	10.3%
West Penn	77.2%	56.5%	65.1%	82.5%	51.9%	57.1%	4.7%	6.0%	9.4%
Total/Industry Average	49.3%	30.3%	38.6%	55.4%	33.2%	36.9%	12.9%	9.7%	11.5%

Annual Natural Gas CAP Default Rate by Poverty Level - 2018-2020

		2018			2019			2020	
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Columbia	16.3%	13.0%	15.6%	19.1%	15.8%	18.5%	2.0%	2.2%	3.2%
NFG	19.0%	19.0%	19.0%	24.4%	24.4%	24.4%	2.2%	2.2%	2.3%
PECO-Gas	28.1%	20.7%	67.1%	28.0%	20.1%	25.4%	13.6%	9.6%	11.8%
Peoples*	23.0%	17.1%	33.8%	24.9%	16.1%	34.8%	8.6%	7.2%	18.3%
Peoples- Equitable*	23.2%	16.3%	54.9%	23.7%	17.5%	54.7%	n/a	n/a	n/a
PGW	26.9%	18.3%	18.7%	32.8%	16.7%	52.1%	4.9%	3.6%	4.1%
UGI Utilities – Gas*	n/a	n/a	n/a	n/a	n/a	n/a	17.8%	15.4%	23.4%
UGI South	33.4%	27.7%	49.8%	31.4%	28.1%	42.0%	n/a	n/a	n/a
UGI North	31.3%	25.7%	44.9%	31.3%	29.6%	41.4%	n/a	n/a	n/a
Total/Industry Average*	25.4%	19.3%	38.0%	27.0%	21.0%	36.7%	8.5%	6.3%	10.3%

^{*}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

CAP Benefits – Bills & Credits

The USRR requires EDCs and NGDCs to report data on CAP benefits. EDCs and NGDCs report by month the number of participants enrolled in CAP. Because CAP enrollment fluctuates during the year, the Commission bases average CAP credits and arrearage forgiveness benefits on the average monthly number of CAP participants rather than the number of CAP participants enrolled at the end of the year.

The PUC has identified the three components of **CAP benefits** as the average CAP bill, average CAP credits, and average arrearage forgiveness. The average **CAP bill** is the total billed (total of the expected monthly CAP payment) divided by the total number of CAP bills rendered. The average **CAP credit** is the difference between the usage-based bill and the CAP bill, divided by the average number of monthly CAP participants. The average **arrearage forgiveness** is the total pre-program arrearages forgiven as a result of customers making agreed upon CAP payments divided by the average monthly CAP participants. The tables show average monthly CAP bills and CAP benefits.

Average CAP bills and CAP credits fluctuate due to several factors, including varying CAP payment plans based on FPIG income levels, type of usage (heating or non-heating), condition of housing stock, and changes in usage related customer behavior.

Average Monthly Electric CAP Bill - 2018-2020

Utility	2018	2019	2020
Duquesne	\$55	\$53	\$53
Met-Ed	\$72	\$58	\$69
PECO-Electric	\$72	\$65	\$68
Penelec	\$62	\$52	\$58
Penn Power	\$68	\$61	\$57
PPL	\$88	\$86	\$85
West Penn	\$73	\$61	\$60
Total/Industry Average	\$72	\$67	\$69

Average Monthly Natural Gas CAP Bill - 2018-2020

Utility	2018	2019	2020
Columbia	\$50	\$52	\$51
NFG	\$65	\$59	\$48
PECO-Gas	\$60	\$64	\$52
Peoples*	\$79	\$77	\$73
Peoples-Equitable*	\$75	\$75	n/a
PGW	\$99	\$115	\$78
UGI Utilities – Gas*	n/a	n/a	\$68
UGI South	\$63	\$67	n/a
UGI North	\$68	\$72	n/a
Total/Industry Average*	\$76	\$83	\$67

^{*}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

Average Annual Electric CAP Credits - 2018-2020

Utility	2018	2019	2020
Duquesne	\$523	\$624	\$625
Met-Ed	\$869	\$865	\$879
PECO-Electric	\$469	\$473	\$491
Penelec	\$797	\$795	\$803
Penn Power	\$841	\$855	\$841
PPL	\$1,028	\$925	\$883
West Penn	\$823	\$807	\$812
Total/Industry Average	\$674	\$671	\$675

Average Annual Natural Gas CAP Credits - 2018-2020

Utility	2018	2019	2020
Columbia	\$711	\$763	\$628
NFG	\$133	\$172	\$163
PECO-Gas	\$89	\$113	\$113
Peoples*	\$349	\$309	\$225
Peoples-Equitable*	\$391	\$357	n/a
PGW	\$961	\$713	\$634
UGI Utilities – Gas*	n/a	n/a	\$274
UGI South	\$440	\$375	n/a
UGI North	\$417	\$479	n/a
Total/Industry Average*	\$579	\$510	\$416

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

CAP Benefits – Arrearage Forgiveness

Amounts of pre-program arrearage forgiveness can differ depending on: the length of time over which forgiveness occurs; the length of time a customer is enrolled in CAP; and the amount of customer arrearages deferred at CAP enrollment.

Average Annual Electric Utilities Arrearage Forgiveness – 2018-2020

Utility	2018	2019	2020
Duquesne	\$164	\$188	\$109
Met-Ed	\$103	\$101	\$97
PECO-Electric	\$42	\$41	\$31
Penelec	\$76	\$75	\$72
Penn Power	\$80	\$80	\$77
PPL	\$357	\$355	\$295
West Penn	\$180	\$125	\$108
Total/Industry Average	\$140	\$146	\$115

Average Annual Natural Gas Utilities Arrearage Forgiveness - 2018-2020

Utility	2018	2019	2020
Columbia*	\$188	\$78	\$45
NFG	\$55	\$72	\$61
PECO-Gas	\$15	\$19	\$16
Peoples**	\$124	\$120	\$107
Peoples-Equitable**	\$91	\$116	n/a
PGW	\$200	\$235	\$189
UGI Utilities – Gas**	n/a	n/a	\$110
UGI South	\$86	\$123	n/a
UGI North	\$90	\$138	n/a
Total/Industry Average**	\$135	\$140	\$113

^{*}The 2018 data reflects a change in the way Columbia reports the amount of average annual arrearage forgiveness.

Percent of CAP Dollars Paid

The **percentage of CAP bills paid** by CAP customers is calculated by dividing the total annual CAP payments (\$) by the total annual CAP amount billed (\$). The higher the percent of CAP bills paid by the customer, the less the public utility may have to recover in uncollectibles. CAP customer payments may include energy assistance grants (*e.g.*, LIHEAP, Hardship Fund, etc.).

^{**}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percentage of CAP Dollars Paid by Electric CAP Customers - 2018-2020

Utility	2018	2019	2020
Duquesne	86.9%	82.0%	72.4%
Met-Ed	90.3%	97.2%	79.7%
PECO-Electric	86.0%	93.0%	77.0%
Penelec	90.1%	95.9%	81.7%
Penn Power	88.4%	95.7%	83.1%
PPL	91.9%	117.2%	95.9%
West Penn	85.9%	93.1%	83.1%
Total/Industry Average	88.1%	93.1%	82.9%

Percentage of CAP Dollars Paid by Natural Gas CAP Customers - 2018-2020

Utility	2018	2019	2020
Columbia	73.5%	77.0%	70.4%
NFG	67.2%	72.0%	65.2%
PECO-Gas	86.0%	93.0%	77.0%
Peoples*	67.6%	93.2%	84.1%
Peoples-Equitable*	65.7%	93.0%	n/a
PGW	62.5%	56.0%	72.9%
UGI Utilities – Gas*	n/a	n/a	88.5%
UGI South	74.5%	89.9%	n/a
UGI North	69.3%	90.2%	n/a
Total/Industry Average*	68.2%	77.0%	77.4%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

CAP Payment Rate

The **CAP payment rate** is calculated by dividing the total number of full monthly CAP payments by the total number of monthly CAP bills rendered. The CAP payment rate reflects overall program totals and is not a household average or broken out by poverty level.

CAP Payment Rate Electric CAP Customers - 2018-2020

Utility	2018	2019	2020
Duquesne	49.8%	48.0%	47.3%
Met-Ed	64.7%	69.1%	54.5%
PECO-Electric	60.6%	61.7%	58.7%
Penelec	70.2%	74.3%	62.3%
Penn Power	69.3%	71.5%	63.6%
PPL	60.5%	60.5%	60.7%
West Penn	59.5%	66.8%	58.1%
Total/Industry Average	60.2%	66.8%	57.7%

CAP Payment Rate Natural Gas CAP Customers - 2018-2020

Utility	2018	2019	2020
Columbia	53.4%	57.0%	51.5%
NFG	69.4%	76.2%	72.1%
PECO-Gas	59.0%	59.6%	56.4%
Peoples*	46.5%	49.1%	47.4%
Peoples-Equitable*	42.4%	45.2%	n/a
PGW	89.3%	57.3%	50.6%
UGI Utilities – Gas*	n/a	n/a	87.8%
UGI South	57.5%	87.0%	n/a
UGI North	54.1%	86.9%	n/a
Total/Industry Average*	65.2%	57.0%	57.4%

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

CAP Costs

The USRR requires EDCs and NGDCs to report data on the three components of **CAP costs**: CAP administration costs, CAP credits, and arrearage forgiveness. Administrative costs include: contract and staffing, account monitoring, intake, outreach, consumer education and conservation training, recertification processing, computer programming, program evaluation, and other fixed overhead costs. Account monitoring costs include collection expenses, as well as other operation and maintenance expenses. The tables below contain the percentage of CAP spending by program component.

Component costs are gross costs and do not reflect any potential savings to traditional collection expenses, cash-working-capital expenses, and bad debt expenses that may result from enrolling low-income customers in CAP. Appendicies 5-7 show total universal service costs, universal service funding mechanisms, and average annual CAP and universal service costs per ratepayer.

Percent of Electric Total CAP Spending by CAP Component – Administrative Costs – 2018-2020

Utility	CAP Administrative Costs		
	2018	2019	2020
Duquesne	6.4%	5.8%	6.8%
Met-Ed	8.4%	9.5%	8.6%
PECO-Electric	4.5%	5.3%	4.3%
Penelec	8.7%	10.1%	8.1%
Penn Power	9.5%	10.8%	9.1%
PPL	4.9%	4.5%	3.8%
West Penn	7.0%	9.6%	8.5%
Total/Industry Average	5.8%	6.2%	5.6%

Percent of Electric Total CAP Spending by CAP Component – Credits – 2018-2020

Utility	CAP Credits		
	2018	2019	2020
Duquesne	71.2%	72.3%	79.4%
Met-Ed	81.9%	81.0%	82.4%
PECO-Electric	87.7%	87.1%	90.1%
Penelec	83.3%	82.1%	84.4%
Penn Power	82.6%	81.6%	83.3%
PPL	70.6%	69.0%	72.1%
West Penn	76.4%	78.3%	80.8%
Total/Industry Average	78.0%	77.1%	80.7%

Percent of Electric Total CAP Spending by CAP Component – Arrearage Forgiveness – 2018-2020

Utility	CAP Arrearage Forgiveness		
	2018	2019	2020
Duquesne	22.4%	21.9%	13.8%
Met-Ed	9.7%	9.5%	9.1%
PECO-Electric	7.8%	7.6%	5.6%
Penelec	8.0%	7.8%	7.6%
Penn Power	7.9%	7.7%	7.6%
PPL	24.5%	26.5%	24.1%
West Penn	16.7%	12.1%	10.7%
Total/Industry Average	16.2%	16.8%	13.8%

Percent of Natural Gas Total CAP Spending by CAP Component – Administrative Costs – 2018-2020

Utility	CAP Administrative Costs				
	2018	2019	2020		
Columbia	2.9%	3.5%	4.4%		
NFG	16.4%	17.1%	13.6%		
PECO-Gas	19.1%	18.2%	14.4%		
Peoples*	7.6%	7.8%	10.5%		
Peoples-Equitable*	4.7%	6.2%	n/a		
PGW	4.4%	5.2%	2.3%		
UGI Utilities – Gas*	n/a	n/a	5.6%		
UGI South	6.3%	6.4%	n/a		
UGI North	8.4%	7.2%	n/a		
Total/Industry Average*	5.1%	5.9%	4.7%		

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percent of Natural Gas Total CAP Spending by CAP Component - Credits - 2018-2020

l latilia	CAP Credits				
Utility	2018	2019	2020		
Columbia	76.8%	87.5%	89.1%		
NFG	59.1%	58.4%	63.0%		
PECO-Gas	69.0%	70.2%	74.7%		
Peoples*	68.1%	66.5%	60.7%		
Peoples-Equitable*	77.3%	70.8%	n/a		
PGW	79.2%	71.3%	75.3%		
UGI Utilities – Gas*	n/a	n/a	67.3%		
UGI South	78.4%	70.4%	n/a		
UGI North	75.3%	72.1%	n/a		
Total/Industry Average*	77.0%	73.9%	74.9%		

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Percent of Natural Gas Total CAP Spending by CAP Component – Arrearage Forgiveness – 2018-2020

Utility	CAP Arrearage Forgiveness				
	2018	2019	2020		
Columbia	20.3%	8.9%	6.4%		
NFG	24.5%	24.5%	23.5%		
PECO-Gas	11.9%	11.6%	10.9%		
Peoples*	24.3%	25.7%	28.8%		
Peoples-Equitable*	17.9%	23.1%	n/a		
PGW	16.5%	23.5%	22.4%		
UGI Utilities – Gas*	n/a	n/a	27.1%		
UGI South	15.3%	23.1%	n/a		
UGI North	16.3%	20.7%	n/a		
Total/Industry Average*	18.0%	20.3%	20.3%		

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

CAP Costs Per CAP Customer

The average **CAP cost per CAP customer** is calculated by dividing the Total CAP Cost by the Average Total CAP Enrollment. This provides an estimate of the amount of program costs for each CAP participant.

Electric CAP Costs - 2018-2020

Utility		Total CAP Costs			Average Program Costs per CAP Customer		
	2018	2019	2020	2018	2019	2020	
Duquesne	\$25,820,755	\$31,408,810	\$28,228,011	\$734	\$862	\$787	
Met-Ed	\$16,128,557	\$14,935,392	\$17,275,244	\$1,061	\$1,067	\$1,067	
PECO- Electric	\$62,290,529	\$60,943,340	\$61,937,043	\$535	\$543	\$546	
Penelec	\$20,282,993	\$18,813,128	\$20,591,486	\$956	\$968	\$952	
Penn Power	\$4,720,719	\$4,421,495	\$4,799,959	\$1,017	\$1,049	\$1,010	
PPL	\$80,034,598	\$82,047,452	\$77,543,968	\$1,456	\$1,341	\$1,224	
West Penn	\$23,885,800	\$17,739,385	\$19,193,779	\$1,078	\$1,029	\$1,005	
Total/Industry Average	\$233,163,951	\$230,309,002	\$229,569,490	\$865	\$870	\$837	

Natural Gas CAP Costs - 2018-2020

Utility	Total CAP Costs			Average Program Costs per CAP Customer		
	2018	2019	2020	2018	2019	2020
Columbia	\$22,396,085	\$20,532,606	\$16,400,570	\$925	\$872	\$705
NFG	\$1,849,773	\$2,150,777	\$1,988,961	\$225	\$295	\$260
PECO-Gas	\$2,595,584	\$3,124,276	\$3,016,774	\$128	\$161	\$152
Peoples*	\$8,927,521	\$7,919,855	\$10,711,116	\$512	\$465	\$371
Peoples-Equitable*	\$6,703,377	\$6,516,599	n/a	\$506	\$504	n/a
PGW	\$59,549,654	\$53,685,784	\$46,050,279	\$1,214	\$999	\$843
UGI Utilities – Gas*	n/a	n/a	\$9,723,855	n/a	n/a	\$408
UGI South	\$4,253,550	\$4,481,481	n/a	\$561	\$532	n/a
UGI North	\$2,671,047	\$3,570,983	n/a	\$553	\$665	n/a
Total/Industry Average*	\$108,946,591	\$101,982,361	\$87,891,555	\$752	\$690	\$555

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

CARES

The primary purpose of a CARES program is to provide a cost-effective service that helps payment troubled customers maximize their ability to pay EDC and NGDC bills and maintain safe and adequate utility service. CARES staff maintains and utilizes a network of community organizations and government agencies that can provide services to eligible customers who are experiencing a temporary hardship. CARES services include account counseling and monitoring (case management) and referrals to services that provide additional resources or assistance, such as LIHEAP and hardship funds.

CARES-LIHEAP

The USRR requires EDCs and NGDCs to report data on their CARES programs. CARES benefits are defined in the USRR as the total number and dollar amount of all LIHEAP benefits applied to all low-income customer accounts. The tables show the number of households receiving only LIHEAP cash grants, but the "Total LIHEAP Grants" dollar amounts include both LIHEAP cash and crisis benefits. 42 The total amount of LIHEAP dollars each EDC or NGDC receives depends primarily on the amount of the federal LIHEAP appropriation to the state and the number of low-income customers who participate in LIHEAP.

⁴² To qualify for a LIHEAP cash grant, a household must have income at or below 150% of the FPIG, be a Pennsylvania resident, and have a heating responsibility. 55 Pa. Code § 601.31. To qualify for a LIHEAP crisis grant, the household must meet the previous qualifications and be experiencing an energy emergency (e.g., utility service is off or in threat of termination). 55 Pa. Code § 601.32. Most households that receive LIHEAP crisis grants also receive LIHEAP cash grants.

Electric CARES-LIHEAP - 2018-2020

Low-Income Households who Received LIHEAP Cash Grants		who F	Low-Income Households who Received LIHEAP Crisis Grants		Total LIHEAP Grants for Low-Income Customers*				
	2018	2019	2020	2018	2019	2020	2018	2019	2020
Duquesne	16,186	8,253	6,984	2,682	3,696	3,179	\$3,871,905	\$3,425,759	\$3,031,673
Met-Ed	8,470	8,023	7,388	2,614	2,728	2,679	\$3,397,341	\$3,333,130	\$3,290,821
PECO-Electric	57,323	32,426	31,159	10,317	16,906	15,571	\$14,295,971	\$15,037,188	\$14,962,585
Penelec	11,083	10,620	9,885	4,176	4,545	4,250	\$4,943,148	\$5,102,771	\$4,881,020
Penn Power	2,820	2,554	2,328	1,279	1,247	1,228	\$1,319,800	\$1,303,623	\$1,275,578
PPL	38,484	19,902	21,935	6,243	2,609	7,128	\$9,001,842	\$6,435,563	\$8,383,363
West Penn	12,176	12,021	11,586	3,812	4,557	4,552	\$5,085,258	\$5,462,256	\$5,582,321
Total	146,542	93,799	91,265	31,123	36,288	38,587	\$41,915,265	\$40,100,290	\$41,407,361

^{*}Total LIHEAP grants include both LIHEAP cash and crisis grants. Typically, customers who receive crisis grants also receive cash grants.

Natural Gas CARES-LIHEAP - 2018-2020

Utility	Low-Income Households who Received LIHEAP Cash Grants		Low-Income Households who Received LIHEAP Crisis Grants		Total LIHEAP Grants for Low-Income Customers*				
	2018	2019	2020	2018	2019	2020	2018	2019	2020
Columbia	18,703	17,537	16,496	3,905	2,408	4,222	\$6,817,598	\$5,371,907	\$5,738,416
NFG	16,637	15,692	14,583	3,054	2,084	2,764	\$5,996,477	\$4,768,166	\$4,694,799
PECO-Gas	10,116	5,722	5,072	1,821	2,984	2,535	\$2,522,819	\$2,653,622	\$2,435,769
Peoples**	31,167	16,541	25,529	4,021	4,070	9,932	\$8,776,860	\$6,474,870	\$9,719,267
Peoples- Equitable**	21,312	11,384	n/a	3,419	3,640	n/a	\$6,218,299	\$4,774,616	n/a
PGW	60,782	51,953	41,055	12,588	8,300	21,784	\$23,666,457	\$18,712,635	\$22,356,499
UGI Utilities – Gas**	n/a	n/a	23,144	n/a	n/a	668	n/a	n/a	\$8,565,518
UGI South	17,342	10,271	n/a	1,029	1,801	n/a	\$3,365,556	\$3,289,554	n/a
UGI North	15,623	9,555	n/a	845	1,433	n/a	\$3,240,268	\$3,217,454	n/a
Total **	191,682	138,655	125,879	30,682	26,720	41,905	\$60,604,334	\$49,262,824	\$53,510,268

^{*}Total LIHEAP grants include both LIHEAP cash and crisis grants. Typically, customers who receive crisis grants also receive cash grants.

^{**}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

The estimated LIHEAP participation rate is determined by dividing the number of LIHEAP cash grants by the number of confirmed low-income customers for each public utility. As LIHEAP participants may only assign their LIHEAP cash grant to one energy vendor, low-income customers with non-electric heating could assign the LIHEAP grant to either their heating supplier (e.g., gas, oil) or their electric utility. Therefore, this participation rate may under-count the actual number of confirmed low-income customers that actually participated in LIHEAP for each utility.

Estimated Electric LIHEAP Participation Rate - 2018-2020

Utility	2018	2019	2020
Duquesne	32.8%	17.1%	14.7%
Met-Ed	11.7%	10.9%	10.1%
PECO-Electric	39.2%	23.2%	23.0%
Penelec	12.2%	11.6%	11.0%
Penn Power	14.0%	12.6%	11.7%
PPL	20.3%	10.5%	11.3%
West Penn	16.8%	16.2%	15.4%
Total/Industry Average	22.9%	14.7%	14.4%

Estimated Natural Gas LIHEAP Participation Rate - 2018-2020

Utility	2018	2019	2020
Columbia	27.7%	25.9%	24.2%
NFG*	54.3%	48.6%	41.4%
PECO-Gas	39.4%	22.9%	19.3%
Peoples**	51.7%	24.4%	23.5%
Peoples-Equitable**	47.7%	27.4%	n/a
PGW	40.7%	35.3%	30.7%
UGI Utilities – Gas**	n/a	n/a	29.8%
UGI South	49.8%	26.3%	n/a
UGI North	71.1%	38.3%	n/a
Total/Industry Average**	31.5%	31.1%	28.0%

^{*}NFG submitted corrected 2018 and 2019 CLI customer counts. The previous counts did not include customers enrolled in CAP.

CARES Costs, Direct Dollars and Net Benefits

The regulations define⁴³ direct dollars as the total of all dollars applied to a CARES customer's public utility account, from all sources of energy assistance such as LIHEAP, hardship fund grants, and local agencies' grants. However, in our report, the column "Direct Dollars in Addition to LIHEAP for CARES Participants" shows the total dollar benefits not related to LIHEAP. These non-LIHEAP additional dollars come from hardship fund grants and other sources (*i.e.*, charities, community programs, etc).

^{**}See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>

⁴³ 52 Pa. Code §§ 54.72 and 62.2.

Total CARES benefits, therefore, includes all LIHEAP cash and crisis grants, plus any additional non-LIHEAP direct dollars. Total CARES benefits reflect the effectiveness of the program in connecting customers with programs and resources that provide financial assistance.

CARES Administrative Costs are not included in the Total CARES benefits because these costs include staff salaries, LIHEAP outreach efforts, and other expenses that may not be a direct benefit to all CARES participants.

Electric CARES Administrative Costs - 2018-2020

Utility	2018	2019	2020
Duquesne	\$135,000	\$135,000	\$135,000
Met-Ed	\$4,033	\$7,764	\$1,647
PECO-Electric	\$1,400,187	\$909,307	\$1,060,017
Penelec	\$7,832	\$11,222	\$1,135
Penn Power	\$2,489	\$2,696	\$1,030
PPL	\$0	\$2,304	\$58,326
West Penn	\$6,489	\$11,520	\$2,674
Total/Industry Average	\$1,556,030	\$1,079,813	\$1,259,829

Natural Gas CARES Administrative Costs - 2018-2020

Utility	2018	2019	2020
Columbia	\$336,931	\$350,513	\$366,306
NFG	\$4,523	\$4,542	\$4,908
PECO-Gas	\$247,092	\$160,466	\$172,561
Peoples*	\$128,834	\$118,243	\$197,515
Peoples-Equitable*	\$89,543	\$85,397	n/a
PGW	\$434,669	\$541,419	\$550,853
UGI Utilities – Gas*	n/a	n/a	\$134,300
UGI South	\$146,449	\$80,372	n/a
UGI North	\$31,713	\$34,634	n/a
Total/Industry Average*	\$1,419,754	\$1,375,586	\$1,426,443

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Electric CARES Benefits - 2020

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Duquesne	\$346,511	\$306,345	\$652,856
Met-Ed	\$410,800	\$70,440	\$481,240
PECO-Electric*	\$14,962,585	\$724,841	\$15,687,425
Penelec	\$479,913	\$50,738	\$530,651
Penn Power	\$142,838	\$16,699	\$159,537
PPL	\$3,473	\$87,312	\$90,785
West Penn	\$612,627	\$65,641	\$678,268
Total/Industry Average	\$16,958,747	\$1,322,015	\$18,280,762

^{*} PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Electric CARES Benefits - 2019

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Duquesne	\$397,436	\$352,355	\$749,791*
Met-Ed	\$2,387	\$500	\$2,887
PECO-Electric**	\$15,037,188	\$158,088	\$15,195,276
Penelec	\$957	\$0	\$957
Penn Power	\$0	\$500	\$500
PPL	\$200	\$48,850	\$49,050
West Penn	\$1,501	\$921	\$2,422
Total/Industry Average	\$15,439,669	\$594,187	\$16,033,856

^{*} Duquesne reported a correction to Total CARES Benefits for 2019.

^{**} PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Electric CARES Benefits - 2018

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Duquesne	\$402,327	\$417,688	\$820,015*
Met-Ed	\$1,725	\$0	\$1,725
PECO-Electric**	\$14,295,971	\$127,415	\$14,423,386
Penelec	\$4,017	\$501	\$4,518
Penn Power	\$1,703	\$0	\$1,703
PPL	\$1,535	\$52,465	\$54,000
West Penn	\$744	\$462	\$1,206
Total/Industry Average	\$14,708,022	\$494,639	\$15,202,661

^{*} Duquesne reported a correction to Total CARES Benefits for 2018.

Natural Gas CARES Benefits - 2020

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Columbia	\$2,877	\$37,544	\$40,421
NFG	\$4,275	\$0	\$4,275
PECO-Gas*	\$2,435,769	\$117,998	\$2,553,767
Peoples**	\$56,287	\$9,397	\$68,684
PGW	\$3,391,773	\$332,217	\$3,723,990
UGI Utilities – Gas**	\$12,818	\$12,000	\$24,818
Total/Industry Average	\$5,903,799	\$509,156	\$6,415,955

^{*}PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

^{**} PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

^{**}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Natural Gas CARES Benefits - 2019

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Columbia	\$6,554	\$51,582	\$58,136
NFG	\$6,844	\$0	\$6,844
PECO-Gas*	\$2,653,622	\$27,897	\$2,681,519
Peoples	\$50,624	\$10,088	\$60,712
Peoples-Equitable	\$22,116	\$7,498	\$29,614
PGW	\$2,426,289	\$1,668,704	\$4,094,993
UGI South	\$10,339	\$20,383	\$30,722
UGI North	\$21,364	\$18,736	\$40,100
Total/Industry Average	\$5,197,752	\$1,753,306	\$6,944,504

^{*} PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Natural Gas CARES Benefits - 2018

Utility	LIHEAP for CARES Participants	Direct Dollars in Addition to LIHEAP for CARES Participants	Total CARES Benefits (Includes LIHEAP)
Columbia	\$3,766	\$50,489	\$54,255
NFG	\$4,263	\$0	\$4,263
PECO-Gas*	\$2,522,819	\$22,485	\$2,545,304
Peoples	\$62,041	\$8,019	\$70,060
Peoples-Equitable	\$26,305	\$2,960	\$29,265
PGW	\$949,234	\$101,044	\$1,050,278
UGI South	\$7,158	\$8,689	\$15,847
UGI North	\$13,239	\$7,613	\$20,852
Total/Industry Average	\$3,588,825	\$150,810	\$3,735,869

^{*} PECO counts all LIHEAP recipients and monies received as part of its CARES program. Other utilities count only the LIHEAP monies issued directly to CARES participants.

Hardship Fund Programs

Public utility hardship funds provide cash assistance to residential customers who need help in paying their public utility bills, often after other resources (e.g., LIHEAP) have been exhausted. The public utility or its agent will apply hardship fund payments directly to the public utility account of eligible customers.

NOTE: Some EDC and NGDC hardship fund programs require that an eligible customer's service must be off or in termination status to qualify for a grant. Customers protected under the Commission's termination moratorium and protections in 2020 may not have met this criteria. Further, some EDCs and NGDCs reported that hardship fund agencies had limited hours or were closed during periods in 2020 due to COVID-19 restrictions. These factors may have contributed to a reduction in hardship fund grants issued by some public utilities in 2020.

Ratepayer and Shareholder Contributions

The USRR requires EDCs and NGDCs to report data on the amount of ratepayer and public utility contributions to hardship funds. Shareholders contribute a large portion of public utility contributions. The Commission considers ratepayer contributions as contributions from public utility employees and ratepayers. The Commission defines public utility contributions as shareholder or public utility grants for program administration, outright grants to the funds, and grants that match contributions of ratepayers. Special contributions consist of additional non-recurring monies added to the hardship fund for the program year, including from formal complaint settlements, overcharge settlements, offsystem sales, and special solicitations of business corporations.

NOTE: The contributions listed below may not include additional funds or grants made available by the administering agency for the utility's hardship fund. This may result in the Total Benefits Disbursed exceeding the Total Contributions.

Electric Hardship Fund Voluntary Ratepayer Contributions - 2019-20

Utility	Voluntary Ratepayer Contributions	Residential Customers	Average Voluntary Ratepayer Contribution per Customer
Duquesne	\$205,454	541,210	\$0.38
Met-Ed	\$120,352	508,754	\$0.24
PECO-Electric	\$92,464	1,502,478	\$0.06
Penelec	\$73,506	501,634	\$0.15
Penn Power	\$37,114	147,020	\$0.25
PPL	\$350,873	1,243,502	\$0.28
West Penn	\$142,820	630,038	\$0.23
Total/Industry Average	\$1,022,583	5,074,636	\$0.20

Natural Gas Hardship Fund Voluntary Ratepayer Contributions - 2019-20

Utility	Contributions Residential Customers Ratep		Average Voluntary Ratepayer Contribution per Customer
Columbia	\$436,601	405,653	\$1.08
NFG	\$43,942	197,945	\$0.22
PECO-Gas	\$15,052	490,074	\$0.03
Peoples*	\$228,157	591,996	\$0.39
PGW	\$753	486,934	\$0.00
UGI Utilities – Gas*	\$104,648	604,375	\$0.17
Total/Industry Average*	\$829,153	2,776,977	\$0.30

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

All Electric Hardship Fund Contributions - 2019-20

Utility	Voluntary Ratepayer Contributions	Public Utility & Shareholder Contributions	Special Contributions	Total Contributions
Duquesne	\$205,454	\$693,081	\$375,000	\$1,273,535
Met-Ed	\$120,352	\$120,352	\$0	\$240,704
PECO-Electric	\$92,464	\$6,311	\$300,981	\$399,756
Penelec	\$73,506	\$73,506	\$0	\$147,012
Penn Power	\$37,114	\$37,114	\$0	\$74,228
PPL	\$350,873	\$670,184	\$964,374	\$1,985,431
West Penn	\$142,820	\$108,089	\$0	\$250,909
Total/Industry Average	\$1,022,583	\$1,708,637	\$1,640,355	\$4,371,575

All Natural Gas Hardship Fund Contributions - 2019-20

Utility	Voluntary Ratepayer Contributions	Public Utility & Shareholder Contributions	Special Contributions	Total Contributions
Columbia	\$436,601	\$150,000	\$0	\$586,601
NFG	\$43,942	\$67,000	\$600	\$111,542
PECO-Gas	\$15,052	\$1,027	\$48,997	\$65,076
Peoples*	\$228,157	\$1,113,090	\$0	\$1,341,247
PGW	\$753	\$122,575	\$0	\$123,328
UGI Utilities – Gas*	\$104,648	\$584,500	\$2,000,000**	\$2,689,148
Total/Industry Average*	\$829,153	\$2,038,192	\$2,049,597	\$4,916,942

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Hardship Fund Benefits

The USRR also requires EDCs and NGDCs to report data on hardship fund benefits. The Commission defines hardship fund benefits⁴⁴ as, "the total number and dollar amount of cash benefits or bill credits." The cumulative total number and dollar amount of the grants disbursed for the program year are reported as of the end of the program year.

^{**}As part of its 2020 Rate Case at Docket No. R-2019-3015162, UGI increased its company contributions to Operation Share by \$2 million in 2020.

⁴⁴ 52 Pa. Code §§ 54.72 and 62.2

Electric Public Utility Hardship Fund Grant Benefits - 2018-2020

Utility	•	payers Average Grant		Total Benefits Disbursed		
	2018-19	2019-20	2018-19	2019-20	2018-19	2019-20
Duquesne	2,192	2,807	\$343	\$494	\$752,054	\$1,387,694
Met-Ed	2,167	953	\$108	\$354	\$233,950	\$337,447
PECO-Electric	552	27	\$573	\$467	\$316,174	\$12,621
Penelec	429	851	\$340	\$343	\$146,000	\$291,783
Penn Power	198	257	\$364	\$343	\$72,000	\$88,186
PPL	2,175	2,418	\$374	\$527	\$813,540	\$1,275,164
West Penn	653	1,159	\$333	\$345	\$217,548	\$399,749
Total/Industry Average	8,366	8,472	\$305	\$448	\$2,551,266	\$3,792,644

Natural Gas Public Utility Hardship Fund Grant Benefits - 2018-2020

Utility	Ratepayers Receiving Grants		Average Grant		Total Benefits Disbursed	
	2018-19	2019-20	2018-19	2019-20	2018-19	2019-20
Columbia	1,079	1,196	\$395	\$408	\$426,042	\$487,716
NFG	241	71	\$258	\$211	\$62,060	\$15,001
PECO-Gas	97	3	\$575	\$685	\$55,795	\$2,055
Peoples*	2,663	2,930	\$413	\$380	\$1,099,720	\$1,113,090
PGW	1,936	249	\$879	\$1,020	\$1,701,062	\$253,992
UGI Utilities – Gas*	n/a	1,383	n/a	\$343	n/a	\$474,591
UGI South	709	n/a	\$305	n/a	\$216,397	n/a
UGI North	316	n/a	\$324	n/a	\$102,371	n/a
Total/Industry Average*	7,041	5,832	\$520	\$402	\$3,663,447	\$2,346,445

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

Total Universal Service Program Spending

Total annual Universal Service program spending is calculated by adding the total program costs for CAP, LIURP and CARES. Stakeholder and voluntary contributions to hardship fund grants are not recovered in public utility base rates. Only hardship fund administrative costs are recoverable for most utilities, so hardship fund program costs are not included in the Total Universal Service Program Spending tables below.⁴⁵

⁴⁵ Only PGW is permitted to recover all utility expenses related to its hardship fund program from its ratepayers. As a city-owned natural gas distribution utility, PGW receives no shareholder contributions for this program. Only voluntary contributions to PGW's hardship fund program are not recovered.

Total Annual Electric Universal Service Program Spending – 2018-2020

Utility	2018 2019 2020		2020
Duquesne	\$28,297,392	\$31,543,810	\$29,929,490
Met-Ed	\$21,755,946	\$20,262,356	\$22,573,045
PECO-Electric	\$69,290,716	\$67,452,647	\$66,347,907
Penelec	\$26,480,948	\$25,873,561	\$25,204,860
Penn Power	\$7,242,197	\$7,266,661	\$7,146,568
PPL	\$90,264,489	\$92,122,145	\$81,403,432
West Penn	\$28,300,622	\$22,940,782	\$24,672,676
Total/Industry Average	\$271,632,310	\$267,461,962	\$257,277,978

Total Annual Natural Gas Universal Service Program Spending - 2018-2020

Utility	2018	2019	2020
Columbia	\$27,253,047	\$26,111,825	\$19,344,496
NFG	\$3,186,234	\$3,333,916	\$2,814,104
PECO-Gas	\$5,092,676	\$5,534,742	\$4,079,266
Peoples*	\$10,351,124	\$8,890,413	\$13,004,345
Peoples-Equitable*	\$7,583,997	\$7,369,738	n/a
PGW	\$68,093,074	\$62,195,671	\$53,651,466
UGI Utilities – Gas*	n/a	n/a	\$11,646,898
UGI South)	\$5,600,907	\$5,724,572	n/a
UGI North	\$3,767,180	\$4,583565	n/a
Total/Industry Average*	\$130,928,239	\$123,744,442	\$104,540,575

^{*}See above: Impact of Utility Mergers on 2020 Collections and Universal Service Data.

4. Small EDC and NGDC Universal Service Programs

The USRR has fewer data requirements⁴⁶ for small EDCs and NGDCs. EDCs with fewer than 60,000 residential customers and NGDCs with fewer than 100,000 residential customers do not file USECPs for Commission approval. Instead, the small EDCs and NGDCs are informally surveyed by the Bureau of Consumer Services (BCS) annually to determine the availability of programs provided to low-income customers as well as the expenses associated with these programs.

As of 4/30/2021 BCS surveyed the following EDCs and NGDCs:

EDCs	Residential Customers		
Citizens' Electric	5,876		
Pike County Power and Light	3,843		
UGI Utilities Inc. – Electric	55,062		
Valley Energy	6,333		
Wellsboro Electric	5,122		

NGDCs	Residential Customers
Peoples Gas LLC	58,000

As a result of the Electricity Generation Customer Choice and Competition Act and the Natural Gas Choice and Competition Act, six small EDCs and NGDCs now have various universal service programs for their low-income customers.

Citizens' Electric (Citizens), Valley Energy (Valley), and Wellsboro Electric (Wellsboro) operate hardship funds through the Dollar Energy Fund.

Pike County Power & Light (Pike) operates its own CAP and hardship fund programs. (Good Neighbor Fund Program).

Peoples Gas LLC (formerly Peoples TWP) operates a hardship fund program through the Dollar Energy Fund and offers a CARES and full-scale CAP program. As of Dec. 31, 2020, the CAP enrollment was approximately 2,879 customers. The public utility also operates a LIURP program, which completed 20 jobs in 2020.

UGI Utilities Inc. – Electric Division (UGI Electric) offers CAP, LIURP, CARES, and Hardship Fund programs. As of Dec. 31, 2020, its CAP program enrollment was approximately 3,285 customers. UGI Electic's LIURP also completed 14 jobs in 2020.

The small EDCs and NGDCs also differ significantly from each other in the total number of residential customers each serves. For example, UGI Electric and Peoples Gas LLC each serve more than 50,000 residential customers. Meanwhile, Citizens', Pike, Wellsboro, and Valley each serve fewer than 6,000 residential customers.

In addition to the EDC and NGDC-sponsored programs, seasonal LIHEAP grants are available to all low-income households meeting the guidelines for LIHEAP eligibility.

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⁴⁶ 52 Pa. Code §§ 54.77 and § 62.7

5. Appendices

Appendix 1 - When is an Account Considered to be Overdue

As mentioned previously in the sections dealing with "Debt", two factors affect the uniformity of the data reported regarding the number of overdue customers and the dollars in debt associated with those customers. First, EDCs and NGDCs use different methods for determining when an account is overdue. Second, EDCs and NGDCs consider either the due date of the bill or the transmittal date of the bill to be day zero. The transmittal date is 20 days before the due date. For USRR comparative purposes, EDCs and NGDCs are requested to consider the due date as day zero and to report debt that is at least 30 days overdue. Appendix 1 shows the different methods EDCs and NGDCs use to determine overdue accounts and how they compare to the preferred method (30 days overdue).

Utility	When is Day Zero (0)	How Many Days Overdue	Days of Variance from BCS Interpretation
Duquesne	Bill Due Date	30 Days	0 Days
Met-Ed and Penelec	Bill Due Date	30 Days	0 Days
PECO-Electric	Bill Transmittal Date	30 Days	20 Days Sooner
Penn Power	Bill Due Date	30 Days	0 Days
PPL	Bill Transmittal Date	30 Days	20 Days Sooner
West Penn	Bill Due Date	30 Days	0 Days
Columbia	Bill Due Date	30 Days	0 Days
NFG	Bill Rendition Date*	60 Days	9 Days Later
PECO-Gas	Bill Transmittal Date	30 Days	20 Days Sooner
Peoples	Bill Due Date	30 Days	0 Days
PGW	Bill Transmittal Date	30 Days	20 Days Sooner
UGI Utilities – Gas	Bill Due Date	30 Days	0 Days

^{*}Bill Rendition Date is one day prior to the Bill Transmittal Date.

Appendix 2 - When Does an Account Move from Active to Inactive Status

The second factor affecting the arrearage data uniformity is when a public utility moves a terminated or discontinued account from active status (included in the reporting) to inactive status (excluded from the reporting). Moving an account to inactive status is one of the last steps in the collections cycle. Appendix 2 shows the methods EDCs and NGDCs use to determine when an account is removed from active status after termination of service or discontinuance of service.

Utility	After an Account is Terminated	After an Account is Discontinued	
Duquesne	7 Days after Termination Date	3 to 5 Days after Discontinuance	
Met-Ed and Penelec	10 Days after Termination Date	Same Day as Discontinuance	
PECO-Electric	30 to 32 Days after Termination Date	Same Day as Discontinuance	
Penn Power	10 Days after Termination Date	Same Day as Discontinuance	
PPL	15 Days after Termination Date	Bill Transmittal Date	
West Penn	10 Days after Termination Date	Same Day as Discontinuance	
Columbia	5 to 7 Days after Termination Date	Same Day as Discontinuance	
NFG	Same Day as Termination Date	Same Day as Discontinuance	
PECO-Gas	30 to 32 Days after Termination Date	Same Day as Discontinuance	
Peoples*	10 Days after Termination Date	10 Days after Discontinuance	
PGW	0 to 30 Days after Termination Date	0 to 1 Day after Final Bill Transmittal Date	
UGI Utilities – Gas**	Same Day as Termination Date	Same Day as Discontinuance	

^{*}The former Peoples Equitable utility maintained the same inactive account status timelines for terminated and discontinued accounts.

^{**}The former UGI South and UGI North utilites maintained the same inactive account status timelines for terminated and discontinued accounts.

Appendix 3 – 2020 and 2021 Federal Poverty Guidelines

2020 Annual Federal Poverty Income Guidelines*					
Size of Household	0-50% of Poverty	51-100% of Poverty	101-150% of Poverty	151-200% of Poverty	
1	\$6,380	\$12,760	\$19,140	\$25,520	
2	\$8,620	\$17,240	\$25,860	\$34,480	
3	\$10,860	\$21,720	\$32,580	\$43,440	
4	\$13,100	\$26,200	\$39,300	\$52,400	
5	\$15,340	\$30,680	\$46,020	\$61,360	
6	\$17,580	\$35,160	\$52,740	\$70,320	
7	\$19,820	\$39,640	\$59,460	\$79,280	
8	\$22,060	\$44,120	\$66,180	\$88,240	
For each additional person, add	\$2,240	\$4,480	\$6,720	\$8,960	

^{*} Income reflects upper limit of the poverty guideline for each column.

Effective: Jan. 14, 2020. SOURCE: Federal Register, Vol. 85, Jan. 17, 2020, pp. 3060-3061.

2021 Annual Federal Poverty Income Guidelines*					
Size of Household	0-50% of Poverty	51-100% of Poverty	101-150% of Poverty	151-200% of Poverty	
1	\$6,440	\$12,880	\$19,320	\$25,760	
2	\$8,710	\$17,420	\$26,130	\$34,840	
3	\$10,980	\$21,960	\$32,940	\$43,920	
4	\$13,250	\$26,500	\$39,750	\$53,000	
5	\$15,520	\$31,040	\$46,560	\$62,080	
6	\$17,790	\$35,580	\$53,370	\$71,160	
7	\$20,060	\$40,120	\$60,180	\$80,240	
8	\$22.330	\$44,660	\$66,990	\$89,320	
For each additional person, add	\$2,270	\$4,540	\$6,810	\$9,080	

^{*} Income reflects upper limit of the poverty guideline for each column. Effective: Jan. 13, 2021. SOURCE: Federal Register, Vol. 86, Feb. 1, 2021, pp. 7732-7734.

Appendix 4 - Instructions to Access Universal Service Reports, Plans and Evaluations on PUC Website

To Access Universal Service Programs & Collections Performance Reports:

- Go to the PUC website at: www.puc.pa.gov.
- On the PUC's website, locate and click on the "Filings & Resources" tab on the headings bar.
- In the column of options on the left side of the page, locate and click on "Reports".
- In the column of options on the left side of the page, locate and click on "Universal Service Reports".
- Choose the desired year of the Universal Service Programs & Collections Performance Report and click to access the report.

To Access Universal Service Plans and Evaluations:

- Go to the PUC website at: www.puc.pa.gov.
- On the PUC's website, hover over the Electricity dropdown menu and click on the "Universal Service" option.
- Under the header "Universal Service Plans & Evaluations" you will find the most current Universal Service Plan and Evaluation for each major EDC and NGDC.

To Access Utility Assistance Programs and Energy Assistance Resources:

- Go to the PUC website at: <u>www.puc.pa.gov</u>.
- On the PUC's website, locate and click on the "About" tab on the headings bar.
- In the column of options on the left side of the page, locate and click "Consumer Education."
- In the column of options on the left side of the page, locate and click "<u>Utility Assistance Programs</u>."

Appendix 5 - Universal Service Programs 2020 Cost Recovery Mechanisms

Riders and USEC/USP Surcharges for CAP costs are recovery mechanisms, in addition to base rates, that are adjusted quarterly or annually. This list is provided to show general recovery mechanisms, which may not apply to all Universal Service programs and may not reflect actual costs per ratepayer.

Utility	CAP Cost Recovery Mechanism	CAP & Universal Service Spending Assessed on Residential Ratepayers	
Duquesne	USC Rider & Base Rates	100%	
Met-Ed	USC Rider-Annual	100%	
PECO-Electric	Univ. Service Fund Charge & Base Rates	100%	
Penelec	USC Rider-Annual	100%	
Penn Power	USC Rider-Annual	100%	
PPL	US Rider-Annual	100%	
West Penn	USC Rider & Base Rates	100%	
Columbia	USP Rider	100%	
NFG	Rider F	100%	
PECO-Gas	Univ. Service Fund Charge & Base Rates	100%	
Peoples	USC Rider F	100%	
PGW*	USEC Surcharge	73.8%	
UGI Utilities – Gas	USP Rider F	100%	
UGI South	USP Rider F	100%	

^{*} PGW's 2020 CAP, LIURP and CARES program costs were recovered from ratepayers in the following manner: residential (73.8%), commercial (21.4%), industrial (1.7%), municipal service (2.0%) and Philadelphia Housing Authority (PHA) (1.1%).

Appendix 6 - Universal Service Programs Annual CAP Spending Levels

Utility	2020 Average 2020 Annual CAP Spending CAP Costs	Number of	Estimated Annual CAP Spending per Ratepayer – 2018-2020		
			2018	2019	2020
Duquesne ¹	\$28,228,011	507,572	\$51.70	\$62.55	\$55.61
Met-Ed	\$17,275,244	508,754	\$32.12	\$29.59	\$33.96
PECO-Electric	\$61,937,043	1,502,478	\$42.19	\$40.93	\$41.22
Penelec	\$20,591,486	501,634	\$40.45	\$37.56	\$41.05
Penn Power	\$4,799,959	147,020	\$32.49	\$30.28	\$32.65
PPL	\$77,543,968	1,243,502	\$65.19	\$66.50	\$62.36
West Penn	\$19,193,779	630,038	\$38.13	\$28.27	\$30.46
Total/Industry Average ¹	\$229,569,490	5,040,998	\$46.83	\$46.03	\$45.54
Columbia ¹	\$16,400,570	382,111	\$60.01	\$54.54	\$42.92
NFG ¹	\$1,988,961	190,152	\$9.77	\$11.35	\$10.46
PECO-Gas	\$3,016,774	490,074	\$5.40	\$6.45	\$6.16
Peoples ^{1,3}	\$10,711,116	560,794	\$28.13	\$24.86	\$19.10
Peoples-Equitable ^{1,3}	n/a	n/a	\$28.50	\$27.75	n/a
PGW	\$33,985,106²	486,934	\$88.91	\$80.81	\$69.79
UGI Utilities – Gas 1,4	\$9,723,855	580,139	n/a	n/a	\$16.76
UGI South 1,3	n/a	n/a	\$12.06	\$12.49	n/a
UGI North ^{1,3}	n/a	n/a	\$17.71	\$23.55	n/a
Total/Industry Average ^{1,2,3}	\$87,891,555	2,690,204	\$35.65	\$33.57	\$32.67

¹ Utilities who recover CAP costs from non-CAP ratepayers rather than all residential ratepayers. For those utilities, the Average Number of Ratepayers reflects non-CAP ratepayers only.

² The NGDC Industry Averages for Universal Service Spending per Ratepayer reflect only the assessed amount for residential customers (73.8%) of PGW's \$46,050,279 2020 total CAP costs.

³ See above: *Impact of Utility Mergers on 2020 Collections and Universal Service Data.*

Appendix 7 - Universal Service Programs Total Annual Spending Levels

Utility	2020 Annual Total Universal Service	2020 Average Number of Ratepayers Paying	Estimated Annual Universal Service Spending per Ratepayer – 2018-2020		
	Spending ¹	Universal Service Costs	2018	2019	2020
Duquesne ²	\$29,929,490	507,572	\$56.66	\$62.82	\$58.97
Met-Ed	\$22,573,045	508,754	\$43.33	\$40.15	\$44.37
PECO-Electric	\$66,347,907	1,502,478	\$46.94	\$45.31	\$44.16
Penelec	\$25,204,860	501,634	\$52.81	\$51.66	\$50.25
Penn Power	\$7,146,568	147,020	\$49.85	\$49.77	\$48.61
PPL	\$81,403,432	1,243,502	\$73.52	\$74.66	\$65.46
West Penn	\$24,672,676	630,038	\$45.18	\$36.56	\$39.16
Total/Industry Average ¹	\$257,277,978	5,040,998	\$54.56	\$53.45	\$51.04
Columbia ²	\$19,344,496	382,111	\$73.02	\$69.36	\$50.63
NFG ²	\$2,814,104	190,152	\$16.82	\$17.59	\$14.80
PECO-Gas	\$4,079,266	490,074	\$10.59	\$11.42	\$8.32
Peoples ^{2,4}	\$13,004,345	560,794	\$32.62	\$27.91	\$23.19
Peoples-Equitable	n/a	n/a	\$32.24	\$31.38	n/a
PGW	\$39,594,782³	486,934	\$101.82	\$93.61	\$81.31
UGI Utilities – Gas ^{2,4}	\$11,646,898	580,139	n/a	n/a	\$20.08
UGI South	n/a	n/a	\$15.87	\$15.96	n/a
UGI North	n/a	n/a	\$24.98	\$30.22	n/a
Total/Industry Average ^{1,2,4}	\$104,540,575	2,690,204	\$43.25	\$40.93	\$38.85

¹ Universal Service costs include CAP, LIURP and CARES.

² Utilities who recover Total Universal Service costs from non-CAP ratepayers rather than all residential ratepayers. For those utilities, the Average Number of Ratepayers reflects non-CAP ratepayers only.

³ The NGDC Industry Averages for Universal Service Spending per Ratepayer reflect only the assessed amount for residential customers (73.8%) of PGW's \$53,651,466 total universal service program costs.

⁴ See above: <u>Impact of Utility Mergers on 2020 Collections and Universal Service Data.</u>



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